



Llywodraeth Cymru  
Welsh Government

# Draft Curriculum for Wales 2022

## guidance: feedback

### Introduction

We welcome your feedback on the draft Curriculum for Wales 2022 guidance.

The feedback period is open from 30 April and closes on 19 July 2019. We will review the feedback we have received and respond to the themes of the feedback following this time.

We will use this information to help us further refine draft Curriculum for Wales 2022 guidance ahead of making it available in January 2020.

There are both general and more detailed questions which you can feedback upon.

If you work in or support the delivery of education, you may wish to respond to more detailed questions around the new curriculum and assessment arrangements, and professional learning. These questions start broad and become more specific the further you progress.

**We recommend you read the following before you respond:**

- [A guide to Curriculum for Wales 2022](#)
- [The area\(s\) of learning and experience you want to feedback upon](#)
- [Assessment proposals to inform the development of statutory guidance](#)

If you complete this survey online you can save your feedback and return to complete it at any time. You will need to provide a name and email address for this purpose only. All published feedback will be kept anonymous. Keeping your personal information safe is important to us. Our website [privacy policy](#) explains how we use your information.

If you need assistance with this survey please e-mail  
[CurriculumForWales2022@gov.wales](mailto:CurriculumForWales2022@gov.wales)

## General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

## Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer: Welsh Government Cathays Park Cardiff CF10 3NQ  e-mail: Data.ProtectionOfficer@gov.wales	The contact details for the Information Commissioner's Office are: Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Tel: 01625 545 745 or 0303 123 1113 Website: <a href="https://ico.org.uk/">https://ico.org.uk/</a>
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## Audience

The following questions help us to understand your relationship to the draft Curriculum for Wales 2022 guidance.

**Do you work in or support the delivery of education?**

Yes	x	No	
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**If yes, what is your organisation? (if no continue below)**

Welsh-medium school (Primary)		Higher education institution	
Welsh-medium school (Secondary)		Diocesan authorities	
Welsh-medium school (Special)		Regional consortia	
English-medium school (Primary)		Local authority	
English-medium school (Secondary)		Private training provider	
English-medium school (Special)		Third sector	
Bilingual school (Primary)		Government	
Bilingual school (Secondary)		Adult community learning	
Welsh-medium middle school		Awarding organisation	
English-medium middle school		Teaching union	
Pupil referral unit (PRU)		Regulatory body (includes Inspectorate)	
Special school		Governing body	
Funded non-maintained setting		Other (please specify): Public Sector Organisation	x
Further education college			

**What is your primary role?**

Headteacher		Chancellor/Vice-chancellor	
Teacher		Lecturer	
Practitioner		Pioneer	
Newly qualified teacher		Governor	
Teaching assistant		Challenge Advisor	
Senior leader		School improvement officer	
Supply teacher		Inspector	
Principal/Vice-principal		Other (please specify): Lead Specialist Advisor – Children, Education, Lifelong Learning and Skills	x

**If you do not work in or support the delivery of education, in what capacity would you like to provide feedback?**

Parent or carer		Employer	
Adult 18+ (not a parent or carer)		Apprentice	
Child or young person (under 18)		Other (please specify): Please see below	
Student/academic			

**Are you providing feedback on behalf of an organisation or group?**

Yes	x	No	
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If 'yes' please specify

	<p>Natural Resources Wales (NRW) is the largest public sector organisation in Wales. Its purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced, and used,</p>
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now and in the future. This means looking after air, land, water, wildlife, plants and soil to improve Wales' well-being, and provide a better future for everyone.

The [Environment \(Wales\) Act](#) and the [Well-being of Future Generations \(Wales\) Act](#) together provide modern legislation for managing Wales' natural resources and improving the social, economic, environmental and cultural well-being of Wales (it's sustainable development). **In light of the recent climate change and environment emergency declaration by Welsh Government and other public bodies**, an understanding and appreciation of the need for the [sustainable management of our natural resources](#) (SMNR) is essential now and in the future, as our environment comes under increasing pressure from a growing population. This will directly impact and be impacted by climate change and will drive the need for increased energy production adding pressure to our use of natural resources, their resilience and biodiversity. In line with the Wellbeing of Future Generations Act this will require work across the environment and education sectors to ensure an understanding and positive connection with the role that natural resources and the environment play in our lives socially, economically and culturally, is established from a young age.

Natural Resources Wales appreciates the work that has gone into the development so far and welcomes the opportunity to comment on the draft Curriculum for Wales 2022 guidance. We wish to highlight:

- The essential role of environmental education, Education for Sustainable Development and Global Citizenship and outdoor learning.
- The importance of the sustainable management of our natural resources now and in the future and an understanding of what this means socially, economically and culturally, from a young age.
- The need to embed environmental learning and sustainable development in the widest sense throughout the curriculum.
- The importance of out of classroom learning and real-life experiences in nature for all ages and abilities supported by confident and competent teaching staff.
- The strong links and multiple benefits of bringing the three strands of natural environment, learning and health together.

Although many people in Wales already enjoy, appreciate and understand the natural world, there are considerable challenges to connect people to the natural environment. **Learning in** (outdoor learning), **learning about** (environmental education) and **learning for** (sustainability) our natural environment is essential for our children, young people and future generations. It significantly contributes to all 6 Areas of Learning and Experience (AoLE), delivers against the Four Purposes of the Curriculum for Wales and provides the required 'opportunities and activities that expand horizons within and beyond the traditional learning environment of the classroom.'

This response has been formulated by the Children, Education Lifelong Learning & Skills Advisory staff in NRW with input from other disciplines/expertise from across the organisation.

Natural Resources Wales would be happy to continue to work with the Curriculum Development team to ensure the required level of environmental awareness is assured within the new framework and can provide access to support networks, resources, data and training for teachers and education professionals.

For further clarification or information please contact:

[education@naturalresourceswales.gov.uk](mailto:education@naturalresourceswales.gov.uk)  
[www.naturalresources.wales/learning](http://www.naturalresources.wales/learning)

## 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?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
<b>x</b>				<b>x</b>
<p>Comments:</p> <p>NRW recognises that the draft Curriculum for Wales 2022 guidance has great potential to help children and young people to become:</p> <ul style="list-style-type: none"> <li>• <b>ambitious, capable learners</b></li> <li>• <b>healthy, confident individuals</b></li> <li>• <b>ethical, informed citizens</b></li> <li>• <b>enterprising, creative contributors</b></li> </ul> <p>However, the guidance also has great potential to be so flexible that it does not provide adequate support and guidance to less experienced teachers. It may highlight and compound current inconsistencies, poor teaching, attainment poverty and financial challenges.</p> <p>The move to more project-based teaching provides plenty of opportunity for cross curricula learning, although this requires creativity and imagination on behalf of teaching staff. Delivery of the new curriculum will only be as good as the knowledge and experience of all teaching staff.</p> <p>There is inconsistency in the way the guidance is laid out e.g. four out of 6 AoLE's have little content to help direct teaching staff, whereas Science and Technology is laid out clearly and provides detail of what is expected at each progression step.</p> <p>Time and space to phase in the introduction of the new curriculum needs to go hand in hand with the first cohorts of newly trained teachers and new resource development. Without a managed and phased introduction there is a danger that old thinking will be disguised as new in the rush to deliver the proposed curriculum, which appears to rely heavily of learner's engagement.</p> <p>As principal advisor to the Welsh Government on the natural environment, NRW recognises the important role for external partners and stakeholders to support new resource development, facilitate support networks and partnerships and provide placements and training opportunities for education professionals and considers it our duty to continue to work with education colleagues to do that.</p> <p>To help children and young people truly meet the four purposes and in particular to become ethical and informed citizens, NRW would like to see:</p>				

- The use of current language and terms when talking about the environment and sustainability, e.g. sustainable management of natural resources rather than “protection”.
- More explicit reference to the natural environment including biodiversity and ecosystem resilience and the inclusion of the sustainable management of natural resources (SMNR) within (ideally) the *what matters statements* and/or supportive narrative.
- Clarity around the existing Education for Sustainable Development (ESDGC) Framework which is only mentioned in one AoLE.
- Improved and expanded guidance on learning in the natural environment and its multiple benefits across the AoLE’s (currently only referenced as separate outdoor learning guidance in the Health and Wellbeing AoLE).

**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?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
		<b>x</b>		

Comments:

It is very difficult to agree that these sum up the priorities for children and young people as many of the statements are very vague and generic whilst others have particular examples included. There is very little consistency in style between the AoLE’s which look as though they have been developed in isolation and although some links are made between them, there is little depth, substance or direction. The way the links are presented is different in each AoLE. Much will depend on the quality and expertise of teaching staff and how they interpret the statements.

As a result, some of the following narratives suffer from the same problem, drifting between vague and specifics. There is little reference to behaviour change or how the *what matters statement progression* steps can help lay down a blueprint of positive environmental behaviour from a young age.

As principal advisor to the Welsh Government on the natural environment, NRW would like to see an explicit reference to the natural environment and the sustainable management of our natural resources (to reflect current legislative language) in the *what matters statements*. We suggest the sustainable management of natural resources should feature in Humanities - *what matters statement 3* – “Our natural world is diverse and dynamic, influenced by physical processes and human actions.” The following text talks about human impacts and future sustainability of our “world” but does not introduce the concept of natural resources and their management. This understanding and future action will be essential if our children and young people are to meet the four purposes.

In statement 5 – we suggest that the sentence towards the end should read “..... *showing a dedication to justice, diversity, ~~and the protection of the environment~~ and the sustainable management of our natural resources*”.

In summary, if something really ‘matters’, in many cases the statements should be more explicit.

**A3. Do you think the [draft Curriculum for Wales 2022 guidance](#) could be improved?**

Yes	x	No	
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**If yes, how do you think it could be improved?**

Whilst understanding the positive move away from a prescriptive curriculum to the proposed framework, NRW strongly feels more detail/guidance/scaffolding is required in places.

At the very least, all AoLE's need to have the level of detail provided in the Science and Technology AoLE, which is laid out clearly and provides clear explanation of the skills and outcomes required whilst allowing flexibility about the topic used.

**Outdoor Learning**

NRW does not want to see the loss of any of the positives currently available in the Foundation Phase Framework i.e. equal access to the indoors and outdoors and is concerned about the overall quality of outdoor learning guidance which only has some detail in the Health and Wellbeing AoLE.

From early discussions with Lloyd Hopkin we understood the guidance on outdoor learning would be overarching across the six AoLE's. Without this, many opportunities to increase physical activity, promote mental wellbeing and provide attainment and assessment opportunities, as well as provide the required 'opportunities and activities that expand horizons within and beyond the traditional learning environment of the classroom' will be missed.

From the provision of an extensive number of training courses for teachers and education professionals, solely as NRW, in partnership with Techniquest and jointly with regional Consortia, we are starting to see outdoor learning described as a noun, a subject, a 'thing' to timetable and tick off on Muddy Monday or Wellie Wednesday, an activity that the younger children do as opposed to an embedded pedagogy.

As principal advisor to the Welsh Government on the natural environment and its sustainable management, NRW would like to see overarching guidance to explain the multiple benefits of the natural environment as a place to learn in, learn about and learn for. Outdoor learning should be portrayed as a fundamental pedagogy, a way of teaching and learning, a unique space in which to learn and teach in, not a subject or a timetabled activity. It covers many aspects including residential stays, adventure education, recognised accredited methods like forest school and coastal school, field work, environmental education and the use of school grounds, local parks, woodlands and beaches - all the places which can "provide rich experiences" for learners.

Evidence of the benefits of learning in the natural environment can be seen on the NRW website in terms of:

- physical activity
- mental well-being
- attainment

Specifically, within the Health and Wellbeing AoLE:

- Outdoor learning, although deemed important enough to have separate guidance on page 17, is not mentioned in any of the What Matter statements or following narratives.

- The guidance on page 17 is inadequate and would be better pulled out as overarching guidance to support all 6 AoLE's. There is no mention of the benefits to attainment and it incorrectly implies learning outside only supports the understanding of emotions in adolescence. The newly launched [High Quality Outdoor Learning in Wales](#) document details 10 expected outcomes and for each outcome, there is a list of indicators of quality and effectiveness which would help expand and create meaningful and useful guidance.
- Throughout the first *what matter statement*, (page 20 onwards), there is no mention of the outdoors or the natural environment and its important role in supporting the development of, and lifelong benefits of, physical health and mental wellbeing.
- Within the 'Links to other areas of learning and experience' section on page 26 and in subsequent *what matters* statements on pages 33, 40, 47 and 54, there is no acknowledgement that aspects of all six AoLE's can be taught in the natural environment bringing physical, mental wellbeing and attainment benefits across the curriculum. Research by Forestry Commission Scotland in partnership with Edinburgh University found that during a 12-week project, children spending a day learning in the woods were 2.7 times more active than on an average school day. More surprisingly, in terms of the amount and intensity of activity, participants **were 2.4 times more active than on a day with timetabled PE.**
- With reference to page 27 – Experiences, knowledge and skills, in the first section, outdoor learning is described as a 'thing' we suggest amending the third bullet point "outdoor learning to support physical health and well-being" to "**learning in the natural environment** to support physical health, well-being **and attainment across the AoLE's.**" It should be noted that the following three bullet points are all aspects of outdoor learning, a further example of the confused guidance within this AoLE.
- Within the following section 'Learners need to know' - and the subsequent *what matters* statements on pages 34, 48 and 55 there is no acknowledgement of the fact that time spent in the natural environment and an early establishment of a connection with nature helps establish positive adult behaviours, both in terms of outdoor recreational activity and pro-environmental behaviours. This early connection with nature helps link knowledge to behaviour and significantly contributes to reaching the four purposes.
- Well-being should also be discussed in the terms and context of the Wellbeing of Future Generations (WoFG) Act. This applies to all public bodies in Wales, should be followed by others and is now defined as well-being socially, economically, environmentally and culturally. From an education perspective understanding the integrated well-being agenda will be key for future decision makers. The Curriculum for Wales also needs to demonstrate its meeting the objectives of the WoFG Act.

### **ESDCG**

NRW is concerned about the lack of clarity of the role of the existing ESDCG Framework which is only mentioned in the Health and Well-being AoLE (p11). Is this Framework to continue as overarching guidance? If so, it should be mentioned alongside the Literacy and Numeracy Framework and Digital Competency Framework in all 6 AoLE's.

### **Sustainable management of natural resources (SMNR)**

The [Environment \(Wales\) Act](#) and the [Well-being of Future Generations \(Wales\) Act](#) provide modern legislation for managing Wales' natural resources and improving the social, economic, environmental and cultural well-being of Wales. **In light of the**

**recent climate change and environment emergency declaration**, an understanding and appreciation of the need for the [sustainable management of our natural resources](#) (SMNR) is essential now and in the future, as our environment comes under increasing pressure from a growing population. This will directly impact and be impacted by climate change and will drive the need for increased energy production, adding pressure to our use of natural resources, their resilience and biodiversity. At the very least this contemporary language needs to feature in Humanities and Science and Technology – For more examples please see question C1.

**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?**

Extremely supportive	Very supportive	Moderately supportive	Slightly supportive	Not at all supportive
		<b>x</b>		
<p>Comments:</p> <p>NRW would like assessment undertaken in the outdoors to be seen as valid and equal to more traditional methods carried out in the formal classroom setting, particularly in light of evidence showing some children excelling in the natural environment. Anecdotal evidence shows teachers are nervous about the validity of assessment in the outdoors and in one case, taking up valuable experience/learning/play time insisting on taking a photo of every child on a beach visit posing with a net.</p> <p>The newly launched <a href="#">High Quality Outdoor Learning in Wales</a> document details 10 expected outcomes and for each outcome, there is a list of indicators of quality and effectiveness which can help ensure meaningful assessment of both curriculum linked learning and wider skills.</p> <p>As an employer of future staff, NRW recognises the need for sufficient and valid assessment to ensure good candidates in the future. If the sustainable management of natural resources and the associated concepts and principals, are not incorporated explicitly in the AoLE’s, understanding and knowledge cannot be ensured and assessed.</p> <p>There is no detail of how assessment will be consistent across Wales.</p>				

**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 information you would want to include**

NRW would like to see information included around pro environmental behaviours, a connection with nature, knowledge and understanding of the natural world and its benefits in terms of increased physical activity and mental well-being.

## Section B – Detailed questions

**B1. How helpful would you find the [draft Curriculum for Wales 2022 guidance](#) in developing a curriculum for your learners?**

Extremely helpful	Very helpful	Moderately helpful	Slightly helpful	Not helpful at all
			x	
<p>Comments:</p> <p>As a public sector organisation and principal advisor to the Welsh Government on the natural environment and sustainable management of natural resources, we view the draft Curriculum for Wales 2022 guidance as slightly helpful in terms of ensuring:</p> <ul style="list-style-type: none"> <li>• appropriate levels of environmental knowledge,</li> <li>• an understanding of the importance and benefits of an early connection to nature,</li> <li>• developing an understanding of the responsible access and use of the environment for recreation,</li> <li>• laying down foundations for healthy adult lifestyles. The lack of guidance around teaching and learning in the outdoors across all 6 AoLE's limits opportunities.</li> </ul> <p>As previously stated the guidance for Science and Technology is laid out clearly and provides detail of what is expected at each progression step and is therefore most helpful in terms of developing a curriculum.</p> <p>It is also unhelpful that all the AoLE's are presented in different ways:</p> <ul style="list-style-type: none"> <li>• Lang and Lit is very repetitive and long.</li> <li>• Humanities abruptly splits into geography and history at Progression Step 5 (although this will make it easier to map to GCSE/A level subjects).</li> <li>• Science and Technology is laid out under different headings for each <i>what matter</i> statement but is generally easier to read and follow.</li> <li>• In some areas specific examples are given, but in others only generic statements are given.</li> </ul>				

**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.**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		x		

Comments:

The quality of learning experiences will depend on the ambition, imagination and creativity of teaching staff and the financial resources available to each education setting.

The term 'broad' is not sufficient. How will 'broad' be assessed? We know that many schools rely on teachers own interests and focus maximum efforts on one discipline to the detriment of other experiences, e.g. all work culminating in a musical competition performance or an over reliance on Forest School.

More guidance on the range of experiences expected is required, e.g. P27 Health and Well-being states, '*learners need to experience...outdoor learning to support physical health and well-being.*' This mostly translates in practice as once a week, once a term or ticked off as a trip to Glan Llyn Outdoor Activity Centre as explained by one teacher on a recent course on assessing in the outdoors. Clear expectations are required to embed best practice across all schools.

If our learners are to meet the four purposes, experiences must include significant amounts of learning in, learning about and learning for the natural environment to ensure an early connection with nature and an understanding of local action and global consequence. Research shows that there are important positive correlations between human health, intelligence and nature. Various studies have shown children are healthier, happier, smarter and more creative when they have a [connection to nature](#). The connection has positive effects on:

- children with attention deficit disorder
- children with asthma
- helping to prevent Vitamin D deficiency
- guarding against obesity and type 2 diabetes
- minimising childhood short sightedness
- promoting academic attainment
- reducing the symptoms of stress
- developing employability skills
- helping to prevent the loss of environmental knowledge and understanding
- opportunities to increase physical activity
- opportunities to lay down a blueprint of pro environmental behaviour

Teaching children in the natural environment is also beneficial for teaching staff and can lay down valuable foundations for future experiences and subject knowledge.

However, if we see teachers of younger learners struggling with how to use the outdoors for learning, there is even more concern at field work level. Field work is mentioned three times in the Humanities AoLE and features in progression step 2 of the first *what matter* statement yet the majority of current Key Stage 2 teachers attending our training courses do not recognise the learning opportunities or know what to do with a pond net, or quadrat or know how to incorporate basic surveying skills into their teaching. As previously mentioned, the content and experiences within Initial Teacher Education, child care and youth work courses are going to be critical if the Curriculum for Wales framework is to serve our learners well.

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>NRW wishes to raise the following points and questions in relation to this question:</p> <ul style="list-style-type: none"> <li>• If according to B2 all experiences have been ‘broad’, will this lead to difficulty when it comes to specialisation at a later stage?</li> <li>• It is not clear how progression steps at 4 and 5 then weave into GCSE and A level topics, except in Humanities which abruptly mentions History and other currently recognised subject areas in progression step 5. How will post 16 and post 18 college-based education map to the new curriculum?</li> <li>• There is a need for valid and transportable qualifications especially if our learners are to be global citizens with the potential to work in countries other than Wales.</li> <li>• The Assessment Proposals document states if something is not on the curriculum it won’t be assessed. This will lead to difficulties if a specialism is not deemed to be included.</li> <li>• If there is no consistency of delivery or assessment it will be difficult for learners and teachers to move from school to school especially if they have gone down a specialist route.</li> </ul>				

**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?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
		x		
<p>Comments:</p> <p>As previously stated there is almost too much flexibility within the draft guidance. Many statements are open to interpretation and whereas some teachers will relish the opportunity and require little support, others will find it daunting, leading to a stressed workforce.</p> <p>The content and experiences within ITE courses are critically important if practitioners and teachers are to design a curriculum specific to children and young people.</p> <p>More time is required to get the right support in place. We believe one extra INSET day has been suggested but this is not enough to benefit the current teaching workforce and learners.</p> <p>Stakeholders and partners need time to analyse the <i>what matters</i> statements and devise new support resources. It is already apparent that some organisations will see this as an opportunity to sell ready-made, off the shelf expensive curriculum packages to less confident and experienced teachers. It is important for the WG Education Department to highlight those public-sector bodies and organisations who can offer high quality, reputable and free support, advice and guidance.</p>				

**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)?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>It is clear that there are plenty of opportunities to support learners to develop skills in the cross-curricular responsibilities (literacy, numeracy and digital competence) and other cross-cutting themes but as previously stated it again relies on the quality and creativity of teaching staff. There also seem to be a few cross-cutting areas missing – for example learning for sustainable development.</p> <p>NRW is therefore concerned about the lack of clarity re the role of the existing ESDGC Framework. This is only mentioned in the Health and Wellbeing AoLE (p11). Is this Framework to continue as overarching guidance? If so it should be mentioned alongside the Literacy and Numeracy Framework and Digital Competency Framework, in all 6 AoLE's. The fact that it is not listed in this question is again indicative of the lack of clarity regarding its position in the Curriculum for Wales and the wider issue of educating for sustainability including the sustainable management of natural resources.</p> <p>To further develop the point above, in light of the Climate Change Emergency declared by Welsh Government, NRW would like to ensure the sustainable management of natural resources embedded as a cross curricular responsibility, although we recognise its important reference within the four purposes.</p> <p>The role of learning in the natural environment to support to development of skills in the cross-curricular responsibilities (literacy, numeracy and digital competence) and other cross-cutting themes also needs to be more explicit – please see detailed response in QA3.</p>				

**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?**

<p>Comments:</p> <p>With a new curriculum and new way of teaching it is important to make things as clear and as easy to use as possible, especially for new or less experienced teaching staff. One could argue that if aspects were important enough to be included in the original frameworks they would expect to be found in the new AoLE's – this would reduce confusion and simplify the system.</p>
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**B7. How well do you think the guidance for each [area of learning and experience](#) will support children during the Foundation Phase years?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>NRW does not want to see the loss of any of the positives currently available in the Foundation Phase Framework i.e. equal access to indoors and outdoors and is concerned about the overall quality of outdoor learning guidance which only has some detail in the Health and Wellbeing AoLE. Please see detailed response in QA3.</p> <p>It should also be noted that during the roll out of the Foundation Phase, overarching guidance documents were issued on outdoor learning, later becoming the <a href="#">Foundation Phase Outdoor Handbook</a> (2009), the development of which we provided support for. NRW would like to again offer its help and expertise in producing something similar, to support all age groups and abilities within the Curriculum for Wales.</p> <p>NRW would like to highlight the recently launched <a href="#">High Quality Outdoor Learning in Wales</a> document that details 10 expected outcomes which all include a list of indicators of quality and effectiveness which would help expand and create meaningful and useful guidance for the Curriculum for Wales.</p>				

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>It is very hard to answer this question. In one way it doesn't matter what anyone 'thinks'. It should be presumed that the new guidance has been devised with that aim in mind, but it will not be obvious until the new system has settled.</p> <p>It should be noted that the pace needs to be adequate to ensure informed and ethical citizens by the age of 16 if the voting age is to be lowered.</p>				

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>As previously stated there is a need for valid and transportable qualifications especially if our learners are to be global citizens with the potential to work in countries other than Wales.</p> <p>There also needs to be some clarity about how the Curriculum for Wales maps to existing over 16 qualifications in order to help young people with further study choice.</p>				

**B10. Formative assessment should be given primacy in the new curriculum. How well do the [assessment proposals](#) promote this principle?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
No comment				

**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?**

NRW cannot comment on putting this approach into practice but has comment around further support.

NRW would like to see assessment undertaken in the outdoors given a valid and equal status to more traditional methods carried out in the formal classroom setting. This is particularly relevant in light of increasing evidence showing many children excelling in the natural environment. Anecdotal evidence shows teachers are nervous about the validity of assessment in the outdoors.

The newly launched [High Quality Outdoor Learning in Wales](#) document details 10 expected outcomes with accompanying lists of indicators of quality and effectiveness which can help ensure meaningful assessment of both curriculum linked learning and wider skills.

As a future employer of staff NRW recognises the need for sufficient and valid assessment to ensure good candidates who have good literacy and numeracy, but also people coming out into society understanding how the world works and how it could work, including the impacts their decisions and actions have on them, their communities and the world. Their ability to understand interrelationships between

natural resources/environment and society and the economy will be vital for future sustainable decision making, locally and globally.

If the sustainable management of natural resources and the associated concepts and principals, are not incorporated explicitly in the AoLE's, understanding and knowledge cannot be ensured or assessed, and a shared understanding of what achievement looks like in the context of the achievement outcomes cannot be met.

**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?**

Practical issues will include:

- Time,
- Easy access to different learning spaces both indoors and outside,
- Ensuring vocational as well as academic qualifications are given equal value,
- Portable globally recognised qualifications,
- Quality of outdoor space including use of local green space, parks, woodlands etc and experience of how to assess in them,
- Planning quality outdoor learning spaces for new build schools,
- Where to get help - training and support networks,
- The existing environmental knowledge and expertise of teaching staff.

**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?**

No comment

**B14. What are the professional learning challenges and opportunities to enact the principles in the [assessment proposals](#)?**

No comment

## 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.

Expressive Arts	x	Language, Literacy and Communication	x
Health and Well-being	x	Mathematics and Numeracy	x
Humanities	x	Science and Technology	x

**Comments (if you choose more than one area of learning and experience please label each comment):**

In light of the recently declared climate change emergency and the scenarios our future generations will have to manage, overarching guidance is required to support learning in, learning about and learning for the natural environment in a local and global context covering all aspects of learning outside the classroom, environmental education and the sustainable management of our natural resources.

Vital nature – NRW’s strategic steer for biodiversity to 2022 states:

*‘Many people have a deep-rooted personal and emotional connection to nature or to a particular place or part of the natural world, often formed from treasured experiences which may go back to childhood. These connections, though we may not always be consciously aware of them, are part of our sense of place and our history and are at the heart of the cultural identity of Wales: they are our natural heritage. The sense of emotional well-being that contact with nature often gives us at a personal level, is of course, only part of the picture. The natural environment also provides us with just about all the things we need to live and thrive: the air we breathe, the water we drink and the food we eat.*

*It provides the raw materials and energy for our homes and industries, and can also protect us against environmental hazards, such as flooding, soil erosion and the impacts of climate change. The natural environment provides employment and sustains communities in all parts of Wales. Thousands of people work in farming, forestry and fisheries, all of which depend on natural resources.*

*Thousands more are employed in the tourism and recreation industries, whose key resource is Wales’ natural environment and the opportunities it provides for enjoyment and relaxation. The wildlife,*

*landscapes and seascapes of Wales are a rich source of inspiration for many forms of artistic and cultural expression. These interactions with nature, in whatever form they take, play an important role in maintaining our mental health and provide opportunities to improve our physical health.*

***Put simply, our well-being and that of future generations depends completely on the natural environment and biodiversity. We literally couldn’t live without it. And what is more, biodiversity has its own intrinsic value as well as being essential for human wellbeing.’***

There is no mention of connection to nature in any of the AoLE’s.

Whilst we understand these are working documents none of the front covers depict anything to do with the outdoors or nature.

### **Health and Well-being**

- NRW welcomes the focus on health and well-being and the links between this AoLE and current legislation.
- NRW welcomes the inclusion of a reference to the ESDGC framework but note this is not highlighted in any other AoLE.
- NRW welcomes the inclusion of separate guidance on outdoor learning but as detailed in the response to A3, feels it is essential to have overarching guidance to cover **all** AoLE’s.

- NRW welcomes the inclusion of play but the section makes no reference to natural play.
- NRW welcomes the links to the other AoLE's but notes there is nothing to promote an understanding of the essential role of the natural environment and resources in terms of health benefits, i.e. the interdependency between the natural environment and our own well-being - clean air, good soil, good food, water quality and quantity, resilient biodiversity, resources for shelter and clothing etc, crucial elements of Maslow's Hierarchy of Needs.
- There is little mention of risk management or risk benefits.
- There is no mention of the need for a connection to nature and a healthy relationship with the natural environment.
- There is a missed opportunity to highlight the role of the natural environment to increase physical activity. A 'range' does not provide enough guidance. Research by Forestry Commission Scotland in partnership with Edinburgh University found that during a 12-week project, children spending a day learning in the woods were 2.7 times more active than on an average school day. More surprisingly, in terms of the amount and intensity of activity, participants **were 2.4 times more active than a day on with timetabled PE.**
- Whilst use of the natural environment and an understanding of its multiple benefits, can be read into some of the progression steps, this will not be obvious to many and needs to be explicitly highlighted in more detail. Ideally this concept should be included in the 'What Matters' statements.
- Progression steps are required around this understanding as pro-environmental behaviours laid down in early life provide the blue print for future healthy lifestyles and responsible citizenship e.g. progression step 3 – "I have developed an understanding that the natural environment impacts on my health."
- There is little mention of active travel to school. We suggest this should be added to the section on whole school approach (p19) and include walking to school as well as introducing initiatives like stopping cars idling at the school gates to help improve air quality.
- There is no guidance about using local green/blue space, the adoption of areas outside the school gate or the importance of improving biodiversity within school grounds.

## Humanities

NRW welcomes the Draft Statutory Guidance Humanities AoLE and is pleased to see the natural world referenced throughout the document and specifically in the third *What Matters* statement. We feel that NRW has a key role to play in supporting the roll out of this AoLE and will be able to supply a range of interdisciplinary resources, data and information to help assist educators to understand how human actions in the past and today affect the natural world and how the natural world impacts on humans.

As pleased as we are that this AoLE does recognise the importance of the natural world we feel it has missed an opportunity to go further:

- There is no explicit mention of SMNR – as future custodians of our natural environment our future generations need to have an understanding of the significance of how the future sustainability of our world is influenced by the impact of human actions. It should be noted that in line with the 2016 Environment Act – the term sustainable management of natural resources (SMNR) should now be used within the Curriculum for Wales documents as

the current and legislative vocabulary used by Wales to talk about sustainability.

- Outdoor learning is mentioned 12 times but there is no guidance as to what this constitutes or where this should be completed (see previous notes on the need for overarching guidance).
- Despite the references to the 'outdoors' the 'natural environment' is not mentioned and the importance of an established connection with nature in order to help understand complicated biological and physical processes is not clear. There is a difference in having the knowledge and being connected enough to the issue to take a personal standpoint and do something about it. The development of pro-environmental behaviour needs to be more prevalent within this AoLE.
- *'I can describe the distinct physical features of places, environments and landscapes in Wales and the wider world.'* *'I can identify some significant spaces, places and phenomena within the natural world'* – there is no guidance as to what these are? How will consistency and quality of learning be ensured across Wales?
- *'Learners should experience the wonder and mystery of the natural world, historical locations, and religious and cultural sites. They should experience playing and learning in and exploring rich indoor and outdoor environments'* yet fieldwork is only mentioned twice in the guidance, once under WM Statement 1, Progression Step 2 and once in Progression Step 5. Learners should have the opportunity to engage in fieldwork throughout each progression step to help them develop their knowledge and understanding.
- The term 'Cynefin' is mentioned 9 times in the guidance but does not feature in the guidance for the other AoLE's. The definition provided is not clear and is open to interpretation. What's wrong with using the term 'local' or 'locality' as in other AoLE's – there is a need for consistency.
- The *What Matters* statements are generally clear, but some progression steps need to be more specific. The term 'a range' is used frequently with no indication of a minimum delivery requirement.
- The terms 'biodiversity' and 'ecosystem resilience' are not mentioned and should feature within the *What Matter* statements – our natural world is diverse and dynamic influenced by physical processes and human actions – there needs to be an obvious link to the Science and Technology AoLE.

### **Science and Technology**

Because of the clear style in which this AoLE is written it is easier to give detailed feedback. We would like to raise the following:

P3 – Introduction first and second paragraphs:

Change biology to **biosciences**

Change to materially, economically, culturally **and environmentally**.

P 12 - Developing a broad and balanced curriculum – 6<sup>th</sup> paragraph

Include **Welsh natural resources**

### **What matters statement 1**

*P18 - Being curious and searching for answers helps further our understanding of the natural world and helps society progress.* **Sets a theme for the AoLE of the importance of society progressing but not in a sustainable way.**

P20 - I can identify which of the Earth's resources are in short supply and describe how they can be used sustainably. **Incorrect - All of the earth's resources need to be used sustainably**

P21 - I can explain why we sometimes choose to act in ways that impact negatively on the environment.

I can analyse the availability of key natural resources. **These seem overly negative and not SMNR themed. We suggest 'I can describe the positive and negative impacts of Science and Technology on society' and I can explain the importance of sustainably managing our natural resources now and in the future'**

P22 - The exploration of living things, including natural habitats **and natural resources** when undertaking inquiries.

P23 - Opportunities to reduce, reuse and recycle. We need to introduce the concept of not buying/using things in the first place. Suggest amending to 'Opportunities to **refuse**, reduce, reuse and recycle.

P24 - that current and past scientific investigation and technological developments can have both positive and negative effects on society **and the environment.**

P25 – that current and past scientific investigation and technological developments can have both positive and negative effects on society **and the environment.**

P27 - that current and past scientific investigation and technological developments can have both positive and negative effects on society **and the environment.**

### **What matters statement 2**

P28 - Design thinking and engineering... **society and the environment**

P37 – Develop empathy through considering the needs and wants of end users - We query use of the word empathy in isolation. Having empathy doesn't mean you do anything about it – link to knowledge leading to action.

P37 - justify design decisions based on factors, e.g. aesthetic, constructional and marketing considerations **Add "and environmental/sustainable"**

This statement is repeated on P 39 and P 41 – the same comment applies

### **What matters statement 3**

P43 – There is a very specific reference to 'diseases' at this level which sets a focus on this from the outset.

P45 – I can describe how living things compete for specific resources and depend on each other for survival. This is not explicit regarding our reliance on natural resources.

P45 - I can analyse how environmental factors and human activity can contribute to changes in habitats and population size. **Add 'and diversity'**

P48 - exploring natural habitats, including microhabitats, e.g. under a stone, under a plant pot, cracks in walls and compost areas'. Use less examples as this is very 'urban' heavy.

### **What matters statement 5**

P 60 – end of the paragraph - Change efficiently to '**sustainably**' in line with the Environment Act 2016

P65 - that they should protect their eyes from the sun. We wish to query why this refers just to the eyes and not to skin too?

### **What matters statement 6**

P72 – Amend to .... legal, social, **environmental** and ethical consequences  
P82 - opportunities to debate the ethical and societal issues of machine learning. Are there/will there be environmental issues of machine learning?  
If so, amend appropriately.

It should also be noted that on page 47 in the links to the Humanities AoLE, the following is stated ‘The effects of human activity on biodiversity/consequences’  
However, biodiversity as a term does not feature in the Humanities AoLE!

The importance and role of agriculture appears to be missing from this AoLE even though it suggests linking to the “environmental science, sustainability and agriculture” part of the Humanities AoLE. Given the central role that agriculture has played in forming of Wales’ landscape and culture to the current time, NRW would like to see clearer reference.

### **Language, Literacy and Communications**

- There is a need to emphasise the influence that the natural environment has had, and does have on language, literature, art and culture. Being in the natural environment acts as a stimulus for writing and oracy. There either needs to be more guidance and detail in the section on P17 or the previous note on required overarching guidance on the natural environment and learning in nature needs to be followed. More detail can also be added to bullet points 2 and 7 on page 78.
- NRW is pleased to see the link to scientific language but also needs to embrace new legislative language, e.g. sustainable management of natural resources. There is also no mention of Latin as the base language of classification systems.
- The term ‘cynefin’ used extensively throughout the Humanities AoLE is not used in this one.
- There is a missed opportunity within the progression steps to include being able to describe an understanding of the health and wellbeing benefits of a connection to nature.

### **Expressive Arts**

- The environment in which learning takes place is noted but there is no reference to the natural environment of Wales being integral to the expressive arts and culture.
- P12 – Welsh Dimension section – this should include a reference to the Welsh natural environment and the role of the landscape in Welsh culture.
- P16 – the Enrichment Experiences section mentions outside the classroom learning but then only gives examples of indoor learning experiences! There needs to be balance and we suggest examples of land art, sculpture trails, environmental art installations etc.

### **Mathematics and Numeracy**

- NRW welcomes the links made between real life experiences and the application of mathematical and numeracy skills included within this AoLE.
- We welcome the links to engineering, science and technology but would like to see advice on teaching outside the classroom e.g. [tree measurements](#) as a way to introduce and consolidate understanding of estimation, measuring, angles and perspective etc.

- More examples of mathematics in nature need to be included e.g. volume, capacity. Only mathematical patterns in nature are mentioned.

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
No comment				

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

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
No comment				

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				
No comment				

**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?**

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		<b>x</b>		
<p>Comments:</p> <p>There are many positive aspects within this AoLE but also important omissions e.g.:</p> <ul style="list-style-type: none"> <li>• More detailed and comprehensive guidance on learning in the natural environment.</li> <li>• The importance of surveying, developing, using and maintaining school grounds.</li> <li>• The importance of linking knowledge with behaviours.</li> <li>• We are pleased to note no mention of the Healthy School Award as positive behaviours should be the norm, not just to gain a badge or award. However are aspects of the award now written into the AoLE's?</li> </ul>				

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

As public sector organisation NRW has a duty to support the Education Department as a whole and the development of the new Curriculum for Wales.

As principal advisor to the Welsh Government on the natural environment and its sustainable management, we also have a duty to ensure concepts and actions are included in the Curriculum. Our Corporate Plan pledges that we will:

*“Help every child in Wales experience and value the natural environment. Work in partnership to influence the new curriculum in Wales to ensure outdoor learning is included within the statutory curriculum for all age groups”*

*“Deliver NRW’s new scheme for the recruitment, support and management of placements including apprenticeships, research and work placements, student work experience placements and volunteering, giving people the opportunity to gain valuable skills and share their experience and expertise”*

*“Work with partners, communities and educators to promote the value of the local natural environment and the opportunities they can provide to improve health, develop skills and support Wales’ cultural heritage”*

Natural Resources Wales is happy to continue to work with the Curriculum team to ensure the required level of environmental awareness is assured within the new framework and can provide access to support networks, resources, data and training for teachers and education professionals.

As mentioned previously NRW has previously supported curriculum change, helping to develop overarching guidance documents (FP Module 6) on outdoor learning (later becoming the [Foundation Phase Outdoor Handbook](#) (2009)). NRW would like to offer its help and expertise in producing something similar to support all age groups and abilities within the Curriculum for Wales and again highlight the recently launched [High Quality Outdoor Learning in Wales](#) document.

For further clarification or information please contact:

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**Return by 19 July 2019**

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