

**Number:** WG52140

Welsh Government  
Consultation – summary of responses

# Proposals for an approach to using data and information in the school system to support learning and improvement and the 14 to 16 Learner Entitlement Indicators Framework

June 2025

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

## Overview

The Welsh Government undertook a consultation between 10 January and 14 March 2025 to gather views on our policy on the use of school and learner data that we already lawfully collect and process. It also sets out expectations for schools to make information available.

## Action required

This document is for information only.

## Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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## Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Data and information to support learning and improvement: for those working within the school system](#)

[Data and information to support learning and improvement: for the general public](#)

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# Glossary

## **14 to 16 Learner Entitlement**

The entitlement for learners age 14 to 16 set out in the statutory guidance on 14 to 16 learning under the Curriculum for Wales – a framework of four components providing a design reference for a school's curriculum offer in Years 10 and 11 in providing learners with a broad and balanced profile of learning and experiences

## **ALN**

Additional Learning Needs

## **AoLE**

Areas of Learning and Experience

## **AWCDS**

All Wales Core Data Set

## **Capped-9 Points Score**

An indicator that looks at a Year 11 learner's best nine GCSEs or equivalent qualifications, including specific subject requirements.

## **Curriculum for Wales (CfW)**

The new [Curriculum for Wales](#) is being rolled out until, from September 2026, all 3 to 16 learners attending local authority maintained settings in Wales will be following the Curriculum for Wales. The aspiration of the Curriculum for Wales is that all learners leave education at 16 with the knowledge, skills and understanding they need to succeed, and having developed the capacities, dispositions and characteristics described in the four purposes, this represents the first step in supporting young people to thrive as lifelong learners.

## **Cymraeg 2050: A million speakers**

[The Cymraeg 2050: A million speakers strategy](#) sets out Welsh Government's long-term strategy to achieving a million Welsh speakers by 2050.

## **EOTAS**

Education other than at school

## **eFSM**

Eligible for free school meals (this status is frequently used as a socio-economic disadvantage proxy indicator)

## **Estyn**

HM Inspectorate of education and training in Wales.

## **FSM**

Free School Meals

**GCSE**

General Certificate of Secondary Education, an academic qualification usually taken by learners aged 15 to 16 in England and Wales.

**Key Stage 4**

Under the 2008 curriculum, this describes school Years 10 and 11 in England and Wales, usually consisting of learners aged 14 to 16.

**LEIF**

Learner Entitlement Indicators Framework

**My Local School**

[Website](#) that allows for public access to a range of data about maintained schools in Wales.

**NEET**

Not in employment, education or training

**Post-16**

The time after a young person turns 16 years old, usually following the completion of GCSEs or equivalent qualifications.

**2010 Equality Act**

It protects the people of Wales against direct and indirect discrimination.

**RVE**

Religion, values and ethics – a mandatory element of the Curriculum for Wales framework

**RSE**

Relationships and sexuality education – a mandatory element of the Curriculum for Wales framework

**SIP**

School Improvement Partner - local authority role supporting schools to improve

**Vocational Qualification**

A training program or course designed to equip people with practical skills or knowledge for a specific career path.

**Personalised Assessments**

Nationally adaptive assessment in reading and numeracy, mandatory for Year 2 to Year 9 learners in maintained schools, used to support pupils' progression by identifying and providing feedback on areas of strength and possible further development.

**WIMD**

Wales Index of Multiple Deprivation

## Summary

### What are the main issues?

In February 2025, the Welsh Government commissioned Miller Research to analyse the responses to the consultation on proposals for an approach to using data and information in the school system to support learning and improvement and the 14 to 16 Learner Entitlement Indicators Framework. This report provides a brief background to the policy area and consultation before outlining the findings of the main consultation activity, consisting of responses to both the school-specific and general public consultation questions. As the Welsh Government takes forward this programme of work, these findings will be supplemented by further analysis that also considers input captured through a series of 14 to 16 leadership events attended by senior 14 to 16 school leaders and any additional considerations raised by education policy leads. The Welsh Government will also be continuing to work with the sector as the detail that will underpin the confirmed elements of the information arrangements is further developed.

### Where are we now?

The period when learners are aged 14 to 16 represents a crucial time in their education journey as they start to undertake external assessments and attain qualifications that will have a significant impact on their future. With the year-on-year rollout of the Curriculum for Wales having commenced for learners in Year 7 in either September 2022 or September 2023<sup>1</sup>, the next academic year will represent the first-time learners under the new curriculum will reach Year 10, with full implementation across the 3-16 continuum set to take place the following year (September 2026).

Last September the Welsh Government published statutory guidance on [14 to 16 learning under the Curriculum for Wales](#) to support practitioners to design, implement and review an inclusive curriculum for learners in Years 10 and 11 as part of the 3 to 16 curriculum. The guidance outlines 'The 14 to 16 learner entitlement', wherein a school's curriculum offer in Years 10 and 11 must provide learners with a broad and balanced profile of learning and experiences designed with reference to 4 components:

- Qualifications in literacy and numeracy
- Qualifications to encourage breadth
- Wider learning and experiences across the curriculum
- Reflections on learning and progress and Post-16 planning.

This guidance references a reformed 'information ecosystem' and expresses the Welsh Government's intention to implement supporting information requirements and

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<sup>1</sup> Secondary schools were given a choice of whether to teach it to Year 7 in 2022/23, as originally planned, or wait a further year until it also becomes statutory for Year 8 in September 2023.

reporting arrangements that align with the priorities and aims of the [14 to 16 learner entitlement](#).

## **The evidence for change**

The publication of the 14 to 16 learning guidance, research commissioned by the Welsh Government into [developing a new data and information ecosystem](#) (report published in early 2023) and continued engagement with partners, have all fed into development of a set of proposals on:

- The Welsh Government's approach to using data and information in the school system to support learning and improvement that will provide clear direction on our expectations related to this, and
- a 14 to 16 Learner Entitlement Indicators Framework (LEIF) that provides clarity on proposals for publication of relevant data at a school level to support the 14 to 16 learning policy.

The Welsh Government ran a consultation on these proposals between 10 January and 14 March 2025 which will inform next steps in setting out their approach, expectations and planned action.

The following summary presents the responses received as part of this consultation, structured by each question asked.

The conclusion section further highlights some key themes that were identified within the consultation responses received.



# Findings

## Consultation Respondents

The 53 responses received to this consultation were independently analysed by Miller Research and collated to form the basis of this report. This consisted of 34 online responses and 19 additional Welsh Government mailbox responses. One of the mailbox responses was submitted as a duplicate response.

**Table 1: Consultation Responses Received**

Response type	Responses received	English	Welsh	Bilingual
Public consultation – general	1	1	0	0
Public consultation – school system	34	29	5	0
Mailbox responses – consultation form submission	15	12	1	2
Mailbox responses – email form submission	4	4	0	0

Source: Consultation Responses

**Figure 1 – Consultation Responses received per geographic spread**



Five consultation responses and one mailbox response were received through the medium of Welsh, with two further mailbox responses received bilingually. The remaining 29 consultation responses and 16 mailbox responses were received in English.

Figure 1 (left) provides a geographic breakdown of responses received as part of the consultation utilising the postcodes provided by respondents. Responses were received across Wales, with 27 received in South East Wales, 7 in West Wales, 3 in Mid Wales, and 13 in North Wales.

Of the responses received, 6 respondents indicated they had a business interest in Wales.

Source: Consultation Responses

## Out of Scope Responses

There were a number of respondents whose responses conveyed opinions about the roll out of the CfW in general and about the reform of qualifications in Wales, which were outside of the scope of this particular consultation. The CfW was subject to a comprehensive Welsh Government consultation process, prior to its introduction in primary schools in 2022. The policy and guidance on 14 to 16 learning under the Curriculum for Wales was also subject to a full consultation process in 2024 following, and alongside continuing, direct engagement with stakeholders. The findings presented here relate to the consultation that aimed to seek views on the set of proposals on:

- **The Welsh Government's approach to using data and information in the school system to support learning and improvement that will provide clear direction on our expectations related to this, and**
- **a 14 to 16 Learner Entitlement Indicators Framework (LEIF) that provides clarity on proposals for publication of relevant data at a school level to support the 14 to 16 learning policy.**

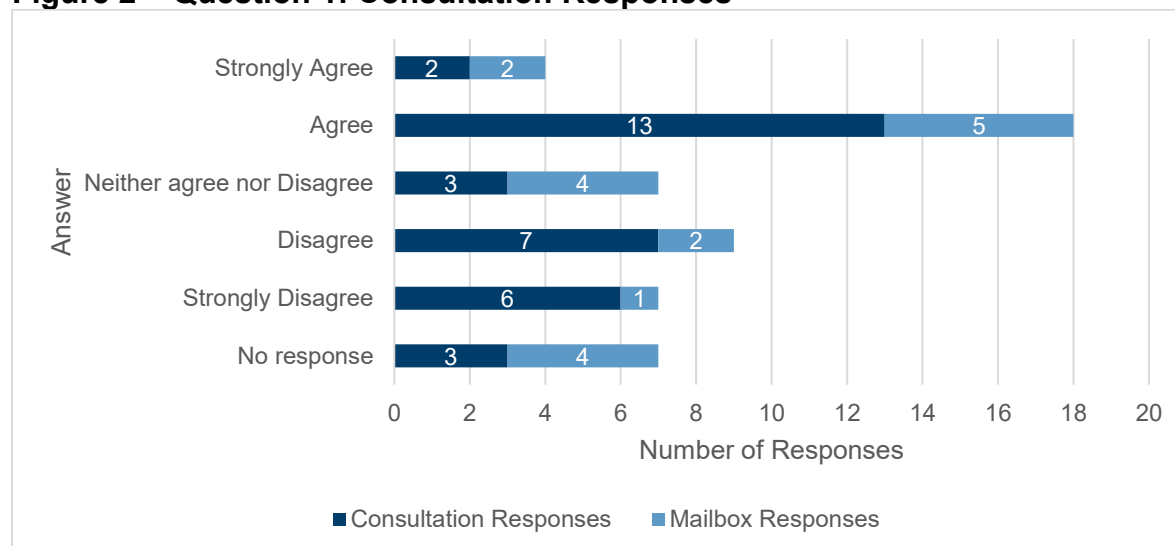
There were also a variety of responses received which were in objection to elements not included within the consultation or which had been misinterpreted. A series of sessions with school leaders were held across Wales to enable the Welsh Government to speak directly to those who would be implementing the approved changes following the consultation. However, there are mixed feelings regarding the proposed changes as a result of past experience of historic competitive performance cultures. Responses overall to the consultation were low and many responses shared views relating to a misinterpretation of the proposals. Where this is the case, this has been noted within each question.

Similarly, many respondents provided answers to questions which were deemed more relevant to other questions. This was particularly prominent in the early questions in the consultation document, with respondent commentary aimed towards specific aspects and indicators related to the LEIF, as opposed to the information ecosystem principles. The analysis also observed a trend of respondents who 'agreed' to some extent with certain statements, but then went on to only make negative remarks in the supporting comments for specific consultation questions.

Where this has been the case, the answer which is the most relevant to each question has been included under each question.

## Question 1 - To what extent do you agree that the overall approach to using data and information in the school system and the information ecosystem principles align with the ethos and ambitions of our Curriculum for Wales?

Figure 2 – Question 1: Consultation Responses



Source: Consultation Responses, n=52

The bar chart shows that out of the 52 respondents to this question, 18 respondents agreed that the overall approach to using data and information in the school system and the information ecosystem principles align with the ethos and ambitions of the Curriculum for Wales (CfW). An additional 4 respondents strongly agreed. On the other hand, 9 respondents disagreed regarding the alignment, 7 strongly disagreed and 7 neither agreed nor disagreed. Seven respondents did not provide an answer to this question.

It is important to note, that out of the 52 respondents who answered this closed question, a further 36 provided additional comments. Of those 36, 14 responses were deemed to be irrelevant or beyond the scope of the question, mostly referring to the specific aspects and indicators of the LEIF, as opposed to the information ecosystem principles. As such, these responses have not been included in the subsequent analysis of this question.

### Agree

Of those who agreed, 3 respondents cited the information ecosystem principles as broad and balanced, aligning with the holistic, learner-centred and quality-focused approach of the CfW. One respondent referenced the principles of 'context matters' and 'flexibility' as coherent with the ethos of the Curriculum, whilst another highlighted the third principle of 'holistic' as well aligned, representing moving away from 'reductive' performance measures. Furthermore, 1 respondent felt that the CfW's ethos of looking at learner progression wider than purely academic standards is reflected in the intentions of the ecosystem principles. Another classified the principles as well-considered, helpful and providing clear direction for all those who will be involved in the use of data, providing a useful framework to refer back to.

Caveats from respondents who agreed included the need for more detail on how the principles would be applied in schools, especially in relation to the use of contextual data and the respective balance between the use of qualitative and quantitative data. Another respondent felt there is a requirement for value added to play a key part in the ecosystem to map learner progress and align with the Curriculum. Two respondents expressed concern that it could foster an unintended impact of high stakes comparisons between schools, which is at odds with the ethos of the CfW. It was also noted that it is difficult to assess the potential of the principles without also considering the LEIF, and vice versa.

### **Disagree**

One respondent who disagreed strongly cited the principles as 'too wieldy', expressing concerns that data collection was likely to be inconsistently managed across schools. Another respondent interpreted the principles as helping promote a product oriented outcome as opposed to the process and purpose oriented curriculum, expressing unease that the proposed system may revert to old practices, though unintentionally, that could contradict the CfW.

Despite the question being directed specifically at the overall use of data and information and the information ecosystem principles, respondents who disagreed tended to direct criticism at how the 14 to 16 indicators were not well aligned with the ethos of the CfW. As such, to avoid confusion we have redirected these responses under the relevant consultation questions where they fit best. The fact that these responses were made under Question 1 will be clearly highlighted.

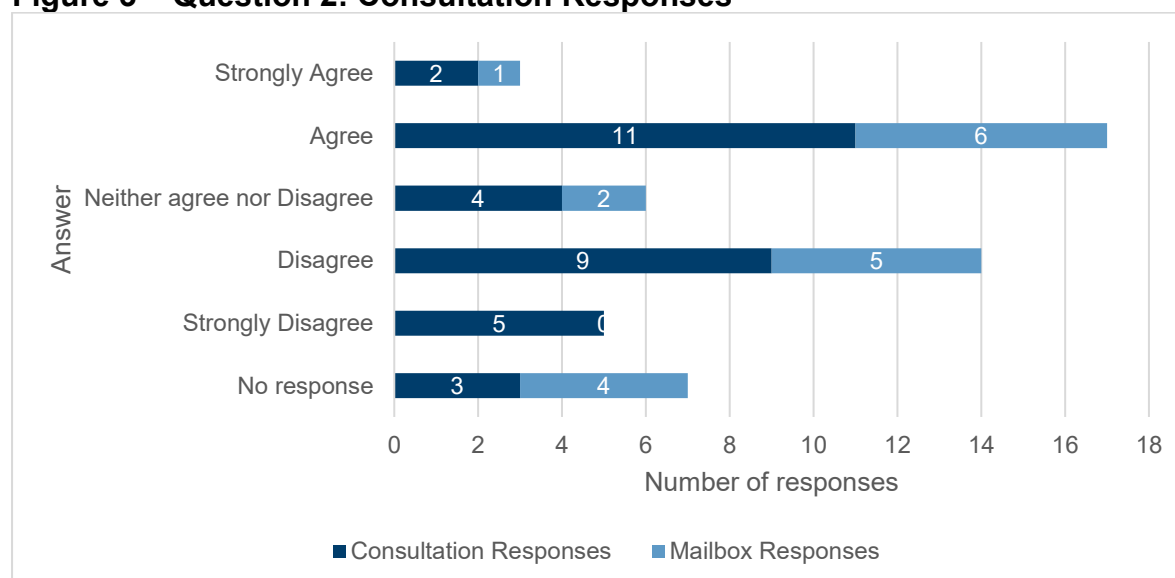
### **Neither agree nor disagree**

Of those who neither agreed or disagreed, 1 respondent categorised the principles as 'compatible' with the CfW in theory, with the hope that it will support a constructive approach to data that supports collaboration and not compliance. However, once again, reservations were made by 2 respondents in terms of how the principles would be implemented in practice and it was felt there was a lack of clarity on what data was presented and how it will be used. Furthermore, whilst 1 respondent agreed there was alignment between the ecosystem principles and the CfW, it was only in the sense that they were poorly defined and open to interpretation.

Overall, multiple respondents across a range of consultation questions expressed concerns that the principles of the information ecosystem could unintentionally create a new form of accountability.

**Question 2 - To what extent do you agree that the information ecosystem principles support a proportionate use of data and information to support evaluation and improvement (an approach that keeps the learner at the centre and does not encourage a performative and accountability-driven system)?**

**Figure 3 – Question 2: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows that out of the 52 responses to Question 2, respondents were split in terms of whether they agreed or disagreed that the information ecosystem principles support the use of data to support evaluation and improvement. Out of a total of 52 respondents, 17 agreed, and 3 respondents strongly agreed. Conversely, 14 respondents disagreed, 5 strongly disagreed and 6 respondents neither agreed nor disagreed. Seven respondents did not provide an answer to this question.

It is important to note, that out of the total 52 respondents who answered this closed question, a further 36 provided additional comments. Of those 36, 8 responses were deemed to be irrelevant or beyond the scope of the question, mostly referring to the information ecosystem principles more broadly than their proportionate use of data and information. As such, these responses have not been included in the subsequent analysis of this question.

### **Agree**

Of those who agreed, 6 respondents felt the information ecosystem principles were broad and balanced enough to support a proportionate use of data. Additionally, they felt the principles will help support the use of data with a focus on learner progress, as opposed to purely outcomes or results, crediting it with avoiding a high stakes accountability system. Specifically, the principle of using data in a non-judgemental way was deemed to enable schools to focus on learner progression that meets their individual needs, as opposed to meeting the requirements of a performance measure.

Two respondents were pleased at the reference in the principles to considering data in a broader context, citing factors such as rural poverty and the proportion of ALN learners needing to be taken into account. One respondent also acknowledged that the principles are helpful in empowering educators, setting out clear expectations around data.

However, 3 respondents also made some caveats. This included stating that whilst the principles are sound, the application of the detail will ultimately determine whether data becomes a vehicle for an accountability driven system, with calls for an implementation strategy. There were concerns about public data release and the unintended consequences that would result, with the potential for organisations such as Estyn to pressure schools to focus on performance at the expense of individual learners. Furthermore, one participant cited that without sufficient funding, schools will struggle to implement effective support strategies.

In terms of amendments to the information ecosystem principles, 1 respondent suggested amending the wording of principle 10 in the context of using data intelligently to include 'education partners', such as LAs, as well as schools. They also felt that principle number 8, being descriptive not judgmental, was appropriate, but highlighted that at some point someone has to use those descriptions to make a judgment. Another advocated for greater consideration on how to ensure the data inclusive, so there is an understanding across all stakeholders. Finally, 1 respondent called for the addition of another high-level principle, stating that information that is published should be reviewed regularly and adjusted to mitigate against any poor behaviours that have arisen.

Overall, respondents felt the effectiveness of the principles in terms of supporting evaluation and improvement relies on sufficient resources, consistent data practices, and shared commitment across the system to use data transparently and constructively.

## **Disagree**

Respondents who disagreed that the information ecosystem principles support a proportionate use of data and information to support evaluation and improvement cited perceived risks around the principles resulting in 'data overload' as well as inadvertently prioritising data over individual learner needs. Whilst some acknowledged that the principles aim to avoid 'performative systems', they expressed scepticism in how they would avoid 'high stakes accountability' in practice, given how embedded this culture is in organisations such as Estyn and local authorities.

Conversely, another respondent who disagreed felt the principles might shift focus too far from measurable performance, making it harder to ensure learners' attainment and progression Post-16 and Post-18, especially without clear structure for comparing school qualifications. Similarly, one respondent felt that without stronger regulatory oversight, the flexible system encouraged by the principles might allow for a "race to the bottom" in qualification standards, damaging the quality and comparability of learners' outcomes. This point was supported by respondents in relation to other questions, with a minority feeling that some degree of accountability was needed to avoid standards from slipping in schools.

One respondent called for a differentiation between data that is helpful to sustain improvement, and data that is helpful for parents to understand child progression, indicating a misunderstanding of the expected uses of data in scope of the consultation – a point that was also made in response to Question 4.

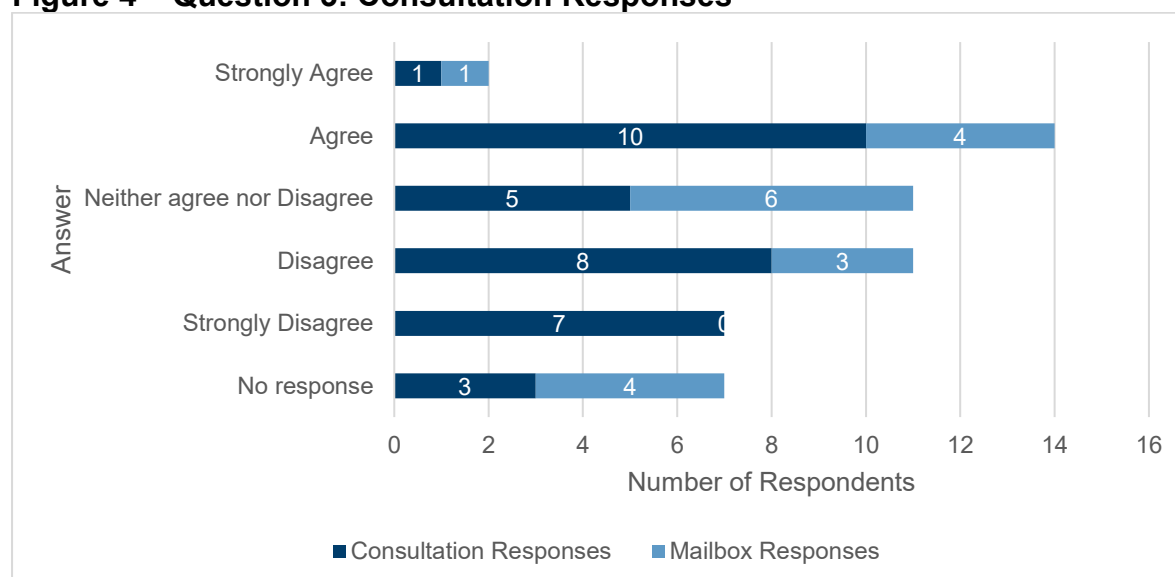
Overall, respondents who disagreed called for greater clarity and guidelines so as to avoid schools overburdening or underutilising the available data.

### **Neither Agree nor Disagree**

There was only 1 respondent who neither agreed nor disagreed who provided further detail. They broadly agreed that the principles can support proportionate, learner centred use of data if applied consistently and over time. However, they were concerned that the volume and complexity of data may lead to a reduction in clarity, possibly hindering effective evaluation and improvement efforts.

### Question 3 - To what extent do you agree that the information ecosystem principles support a sustainable use of data and information to support evaluation and improvement?

**Figure 4 – Question 3: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows that responses to Question 3, slightly more respondents disagreed than agreed with the statement that the information ecosystem principles support a sustainable use of data and information to support evaluation and improvement. In total, 14 respondents agreed and 2 strongly agreed, as opposed to 11 who disagreed and 7 who strongly disagreed. Eleven respondents neither agreed nor disagreed and there were 7 non-responses.

It is important to note, that out of the total 52 respondents who answered this closed question, a further 35 provided additional comments. Of those 35, 6 responses were deemed to be irrelevant or beyond the scope of the question, mostly referring to workload more generally or the wider context of the use of data to support evaluation and improvement. As such, these responses have not been included in the subsequent analysis of this question.

#### **Agree**

The respondents who agreed cited the principles as being objective, helping empower schools for self-evaluation and improvement (5). It was felt that by setting out clear expectations around data use, the principles will empower educators and schools in the long-term to better support learners, share good practice and seek improvement in an environment not driven by decontextualised performance targets. The principles of 'user-friendly presentation' and 'descriptive, not judgmental', were deemed by one respondent to reinforce sustainable usage of data, whilst the principle of 'context matters' was cited by another respondent as imperative in enabling schools to identify strengths, examples of best practice and areas for improvement by comparing with schools in a similar context.



One respondent who agreed with the question also provided several caveats on how effective the principles will be in supporting evaluation and improvement. This included the format of how the data will be presented, citing the All Wales Core Data Sets (AWCDS) as counterproductive when seeking to self-evaluate. Furthermore, they felt there is a need for a programme of professional learning on data use and other sources of evidence in self-evaluation to accompany the principles.

### **Disagree**

Four respondents expressed concern that the wider use of data encouraged by the information ecosystem principles would cause an administrative burden as opposed to supporting evaluation and improvement. In addition, the principle of thoughtful publication was another cause for concern for another respondent who expressed scepticism at how publishing data would support school improvement. They specifically highlighted the timing of publication as an issue, as School Improvement Plans (SIPs) are created months before national datasets are released.

Other respondents who disagreed cited concerns that the principles would encourage a drop in standards (2), with schools losing further sight of performance at a local and national level if no modelled outcomes are in place. One respondent stated there was a current lack of clarity as to what exactly the ecosystem will provide to allow schools to support evaluation and improvement. Finally, there were calls for a sustained approach over time (1), as well as ongoing evaluation and flexibility to ensure the principles embedded across the system (1).

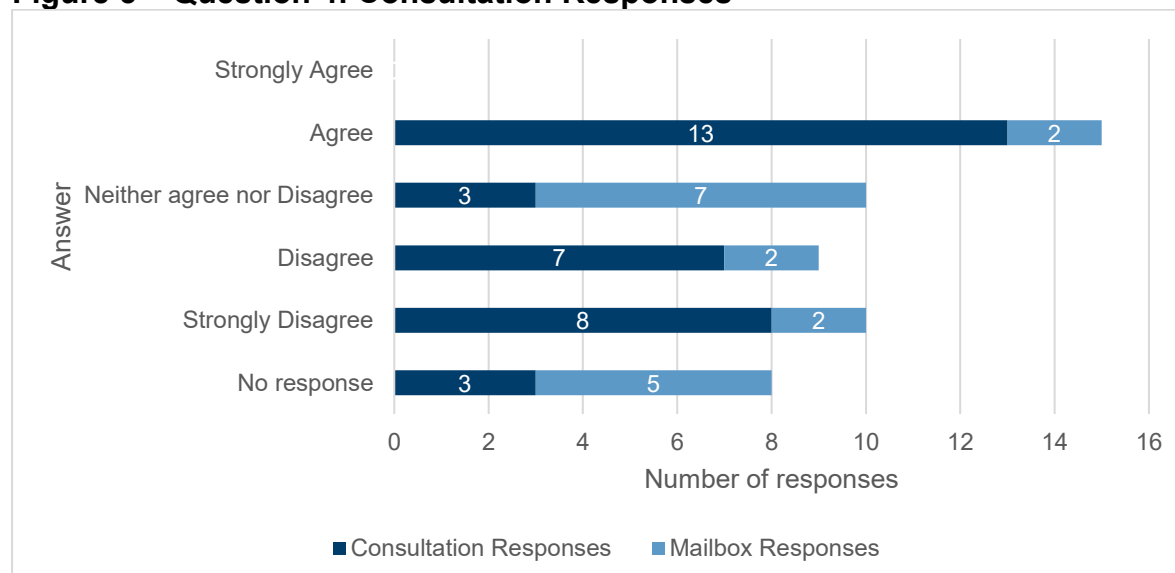
### **Neither agree nor disagree**

Of the respondents who neither agreed nor disagreed, 2 explicitly stated the information ecosystem principles have the potential to support a sustainable use of data to support evaluation and improvement through its advocacy of a more balanced and contextualised approach.

There were, however, several caveats made by respondents. This included the principles being workload intensive, thus risking school capacity and the need for greater clarity and guidance regarding the range of information to be considered, ensuring consistency of approach. Once again, 1 respondent called for ongoing review and training at all levels to accompany the principles, as well as clear realistic timelines for embedding the new system and reviewing progress. Another respondent welcomed the emphasis on using the data for self-evaluation and improvement but felt there was also need for additional resources for schools that outlines best practice and worst practice examples.

## Question 4 - To what extent do you agree that the information ecosystem principles allow for a balanced and holistic understanding of schools and learning by external audiences, such as parents and carers?

Figure 5 – Question 4: Consultation Responses



Source: Consultation Responses, n=52

The bar chart shows that of the consultation responses to Question 4, there were more respondents who disagreed that the information ecosystem principles allow for a balancing and holistic understanding of schools and learning by external audiences than agreed. In total, 15 respondents agreed, compared to 9 who disagreed and 10 who strongly disagreed. No respondents strongly agreed with the statement. A further 10 respondents neither agreed nor disagreed and there were 8 non-responses.

Of those who responded to this question, 38 provided additional information. From this, 13 responses were beyond the immediate scope of this question, with respondents referring to specific elements and measures that were not directly relevant to the information ecosystem principles. This included the 50 entries threshold for a qualification<sup>2</sup>, the Capped-9 Points Score and the need to move grade boundaries.

### Agree

Four respondents who agreed with the statement cited the principles as incorporating a more holistic, honest and rounded view of school and learning. They were also praised for allowing transparency and enabling parents to see the broader picture. The inclusion of the principle of 'context matters' was praised by 2 respondents, as they felt it would allow for examination and understanding of a school by external audiences in a much broader sense than previously. Several

<sup>2</sup> This refers to content the use of qualifications data in the 14-16 LEIF outlined in the consultation document. If there are fewer than 50 entries for a qualification, it is proposed the outcomes will not be proactively reported due to likely volatility in outcome patterns which prevents of meaningful analysis of the data.

respondents caveated the need for guidance/education for external audiences so they can fully understand the importance of critical aspects, such as context. In a similar theme, 1 respondent referenced that the method of reporting, as opposed to the principles themselves, that would ultimately determine whether external audiences have a balanced and holistic understanding of schools and learning.

### **Disagree**

A common theme amongst respondents who disagreed was that the application of the principles would lead to school comparisons by parents, enhancing competition between schools and destroying collaborative culture (3). One respondent felt there was too much content suggested in the principles to be understood by those outside the profession, whilst another explicitly criticised the overall way in which the Welsh education system seeks to engage with parents, stating that they could not see how the principles will reduce these concerns.

Two respondents highlighted that the principles will not support a holistic view of school and learner performance, due to the lack of a value added measure to consider learners' starting points and the limitation of qualitative and quantitative data. One referenced that only school inspections will provide external audiences with a comprehensive understanding of school performance. A respondent who strongly disagreed felt the application of the principles could provide insufficient and variable information for parents and carers, leading to misinterpretation.

Finally, echoing responses to other questions, 2 respondents called for Welsh Government to clarify what information is helpful for parents and carers to know and how this is different to data for schools to be evaluated and sustain improvement, with apprehension that if these two aspects are not carefully separated, schools may be pressured into producing data that prioritises external perception over meaningful school improvement.

### **Neither agree nor disagree**

Two respondents who neither agreed nor disagreed stated that the principles of the ecosystem allow for a balanced and holistic understanding of schools. Any barriers to external audience understanding of schools and learning were mainly directed at indicators in relation to the LEIF, with calls for greater clarity and guidance accompanying the proposed framework and indicators. These are explored further under the appropriate questions.

## **Question 5 - Are there any other principles or aspects to the proposed information ecosystem principles that should be added?**

Of the 32 responses to this question, 26 respondents felt that there were other principles or aspects to the proposed information ecosystem principles that should be added, whilst 2 respondents felt that there were not. Four further respondents were not sure.

### **Yes**

Respondents highlighted several areas for consideration in terms of additional principles or aspects that should be added to the proposed information ecosystem principles.

Four respondents referenced the importance of strengthening ethics and safeguards, including the learners right to privacy, as well as transparency and adaptability in the use of learner data, while two respondents cited the importance of safeguards as a principle in terms of preventing data misuse, ensuring it supports improvement rather than what they deemed 'punitive measures'. One respondent suggested a long list of potential additional principles including: Inclusivity, Data sovereignty, Interoperability, Sustainability, Cultural sensitivity and Resilience and Collaboration, citing the need to ensure the ecosystem is fair, adaptable, and respectful of diverse needs, while remaining secure, sustainable, and responsive to changing contexts.

Respondents also felt as if the information ecosystem principles may need to be developed further to address areas such as accountability, intervention strategies and workload impact, Post-16 support and equity and parental engagement. Two respondents also highlighted that the principles could more explicitly link to the 14-16 guidance, while a further 2 respondents highlighted that there was insufficient detail within the principles in terms of supporting underperforming learners, questioning how they will be supported at a system level. They called for principle 3 (holistic) to be strengthened to include detail about not providing a narrow range of information.<sup>3</sup>

Whilst an already existing principle, the importance of considering context was reemphasised by four respondents. Specifically, there were calls for greater use of the Welsh Index of Multiple Deprivation (WIMD) and funding per pupil as measures to factor in when looking at school performance. It was also felt that WIMD was a more suitable indicator than eligibility for Free School Meals (FSM) when determining impact of poverty / deprivation on learner effectiveness. One respondent felt a missing principle is ensuring data does not contribute and entrench inequalities between schools, particularly those who serve disadvantaged communities. Finally, 1 respondent felt, given the national mission, that there is scope for the Welsh language to be an explicit consideration/principle.

### **No**

One respondent believed the principles were balanced and broad enough as they were presented correctly, whilst another wished for more clarifications around existing principles.

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<sup>3</sup> It is important to note however, that the principle 3 already explicitly states about avoiding overreliance on a narrow range of information

## **Question 6 - What effect will the information ecosystem principles have on the workforce, including any impact they may have on workload?**

Of the 37 responses to this question, 20 respondents felt that the information ecosystem principles would have a negative effect on the workforce, 6 felt there would be a positive effect, and 11 provided a neutral response.

### **Negative effects**

Overall, respondents tended to make comments relating to the overall impact that the framework and indicators under the LEIF would have on the workforce, rather than the impact of the information ecosystem principles specifically.

Six respondents highlighted the reporting expectations that accompany the principles would add to teacher workload, while 3 respondents highlighted concerns regarding the ability of teachers to adapt to the new approach to data collection enshrined under the principles (particularly if this occurred in the absence of professional development training on the changes). Respondents perceived a lack of clear guidance in relation to expectations around school publication, with concerns regarding the quantity of contextualised information gathered and the complexity of analysing and presenting that information in a meaningful way.

### **Positive effects**

A minority of respondents indicated that the information ecosystem principles would have a positive effect, or at least neutral effect on the workforce, with one respondent claiming they would make existing data collection arrangements more efficient, thus reducing workload (1). Additional positive effects on the workforce included the potential to move away from the narrow set of performance-driven measures to evaluate school performance and therefore reduce the external accountability pressure faced by schools based on these measures (1). Furthermore, 3 respondents felt that this is an opportunity for teachers to focus on learner needs and a culture of collaborative reflection. It was suggested by 1 respondent that the information ecosystem principles may support educators to be able to better explain to learners the pathways they are offered to them.

### **Neutral**

Neutral respondents indicated that the principles should be simpler and more user friendly. One respondent provided three recommendations which they believe could help minimise workforce burden while implementing the principles of the information ecosystem: providing clear guidance and standardised reporting templates, investing in digital tools to support data collection and analysis, and ensuring training and support for implementation.

Another respondent suggested that the potential negative effect of the proposed changes on workload and capacity in schools could be mitigated if the Welsh Government could provide funding for all schools to have access to a common tool for qualification/attainment data tracking in schools to support with data analysis.

### **No response**

Additionally, 15 respondents did not provide a response to this question.

## **Question 7 - What are your views on the information ecosystem principles supporting individual learners and meeting their diverse needs, including those learners from disadvantaged backgrounds and those learners who share protected characteristics (as set out under the Equality Act 2010)?**

Of the 34 responses to this question, 9 respondents focused on a range of issues not directly related to the information ecosystem principles. This included specific references to the LEIF, the concept of added value, as well as posing the question of which group of learners would be included.

### **Disagree**

Overall, 11 respondents disagreed that the principles supported individual learners and met the diverse needs. The principle of reporting and sharing data was highlighted by one respondent as potentially risking identifying individual learners, especially in smaller settings. It was also noted by two respondents that without proper disaggregation and interpretation, data could reinforce systemic inequalities rather than address them. Given that some schools may lack the resources or system to analyse such detailed data effectively, the potential need for more advanced national infrastructure was further highlighted by one respondent.

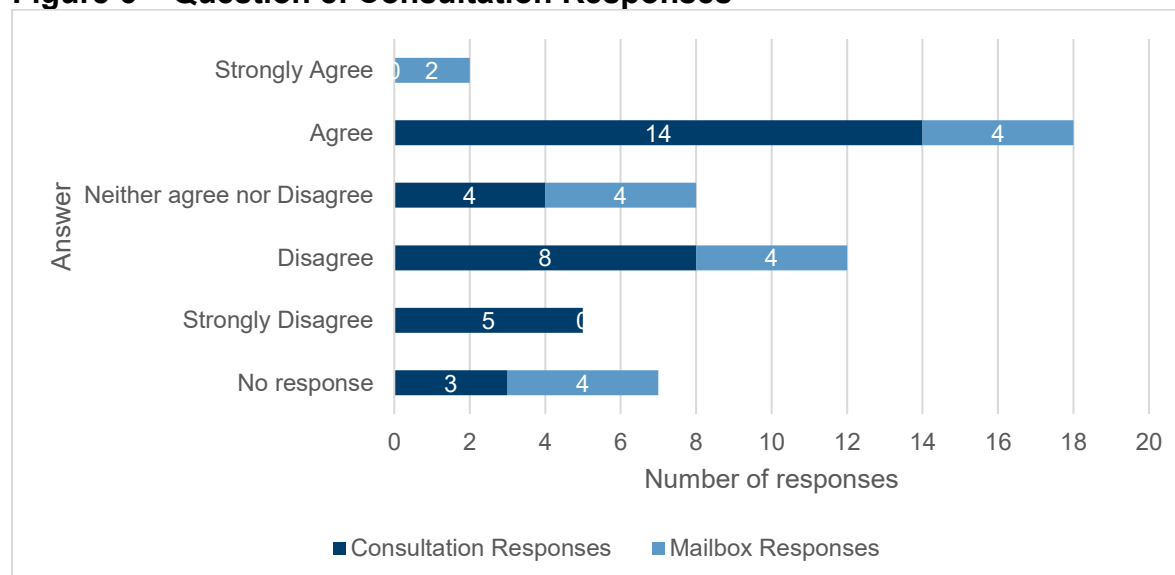
### **Agree**

In total, 14 respondents expressed agreement that the information ecosystem principles could support the diverse needs of individual learners. Of those who agreed, four respondents valued the potential for the information ecosystem principles to promote equity, accessibility, and tailored support for disadvantaged learners and those with protected characteristics.

Five respondents cited the principle of flexibility as critical in meeting the evolving needs of learners. Three respondents mentioned the importance of being learner focused when supporting those with diverse needs and protected characteristics, explaining that the first principle on a 'learner-focused approach' will support this goal, with the caveat that it requires a school to have the staffing capacity to ensure that this can be achieved. Overall, the principles were seen to acknowledge that a "one size fits all" approach is ineffective and instead promote a learner-centred system.

## Question 8 - To what extent do you agree that the 14 to 16 Learner Entitlement Indicators Framework (LEIF) aligns with the 14 to 16 Learner Entitlement while supporting our wider Curriculum for Wales ambitions?

Figure 6 – Question 8: Consultation Responses



Source: Consultation Responses, n=52

The bar chart shows overall that 18 respondents agreed and a further 2 respondents strongly agreed that the LEIF aligns with the 14 to 16 Learner Entitlement. On the other hand, 12 respondents disagreed, 5 consultation respondents strongly disagreed and 8 respondents neither agreed nor disagreed. Furthermore, 7 respondents did not provide an answer to this question.

### Agree

Overall, the respondents that agreed that the LEIF aligns with the 14 to 16 Learner Entitlement suggested that alignment can be achieved through exerting pressure on schools to ensure that the entitlement is met. Furthermore, it was felt that the LEIF could allow for attainment data on Cymraeg, English and Mathematics to be added to My Local Schools website to enable the data to be utilised more effectively. Two respondents who agreed felt that the 14 to 16 LEIF is balanced and learner centric. Another respondent mentioned how they feel that the LEIF proposals make a deliberate and clear shift away from the 'old regime' to something which has the potential to meaningfully improve backwash into teaching and learning, thus supporting the Curriculum and the 14 to 16 Learner Entitlement.

In answering a different question, one respondent praised the inclusion of EOTAS learners in the scope of the LEIF as evidence of alignment with Curriculum for Wales. Another praised the move away from "quartiles and quintiles" as in keeping with the ethos of the Curriculum.

Whilst most respondents agreed that the LEIF aligns with CfW goals, only a handful of them provided explanatory comments and some (3) included caveats regarding their response. This included:

- Concerns about tension between a learner-focused approach to attainment/progression up to age 14, and graded qualifications at 14-16, with the suggestion that an “overreliance on certain data” could result in schools focusing on certain subjects to “chase the performance measure”.
- Concerns that the number of indicators could make the LEIF too cumbersome to administer and report, with the suggestion that the volume of reported data on each qualification would be meaningless to parents, employers or other stakeholders which would negatively affect the communication of learner progress under the CfW.
- A caveat was noted by 1 respondent that whilst the indicators for groups of qualifications (e.g.: by AoLE) would aid self-evaluation and build a better understanding of how the curriculum has evolved, the absence of a digital literacy measure fails to align with the CfW where digital literacy is a cross-cutting theme.

## **Disagree**

Respondents who disagreed (12) or strongly disagreed (5) that the LEIF is aligned with the 14 to 16 Learner Entitlement and CfW cited a variety of reasons. This included the potential of the LEIF to encourage a performative culture amongst schools, with 1 respondent suggesting this culture could in turn result in the LEIF “inadvertently narrow[ing] curricular focus”, as schools prioritise subjects included in the framework, “rather than fully embracing the broader CfW ambitions” or prioritising “innovative or individualised learning approaches.” This was supported by another respondent who felt that the LEIF could potentially lead to the exclusion of “small cohort subjects” which “could restrict learner choice”, contradicting the ethos of the CfW of ensuring all subjects are fairly represented.

Four respondents who disagreed felt that certain elements needed to be clarified, including whether the AoLEs will be given equal standing. One respondent explained that if residuals are used for contextual data, they would need to be provided for each subject area at each grade, resulting in a lengthy and unwieldy analysis. Similar to previous concerns raised, they felt by choosing certain subjects or grades at which residuals are provided would convey the message that some subjects and some grade boundaries are more important, perpetuating the over-focus on certain subjects and certain grade thresholds.

Concerns were also raised by 1 respondent that the LEIF fails to measure learner progress over time (i.e. it measures attainment at a single point in time) therefore not reflecting learner progression through the CfW. Another respondent mentioned that they disagreed with the fifth, sixth and seventh cross-cutting features that underpin the approach to reporting 14 to 16 learning data. They felt that the data reported should not be of one type and that there should not be a blanket policy on which types of indicators used, but reports should consist of a range of different indicators instead. The choice of indicators should be guided by their practical value and lessons from past negative impacts, such as the move away from Level 2 inclusive due to its unintended consequences. While they recognised concerns about misinterpretation, they argued that a 50 entries threshold would limit data availability for smaller secondary schools and suggest a lower threshold, like 15, would be more appropriate. They also supported some data suppression for public platforms but



believed schools and partners should receive full, unsuppressed data for self-evaluation.

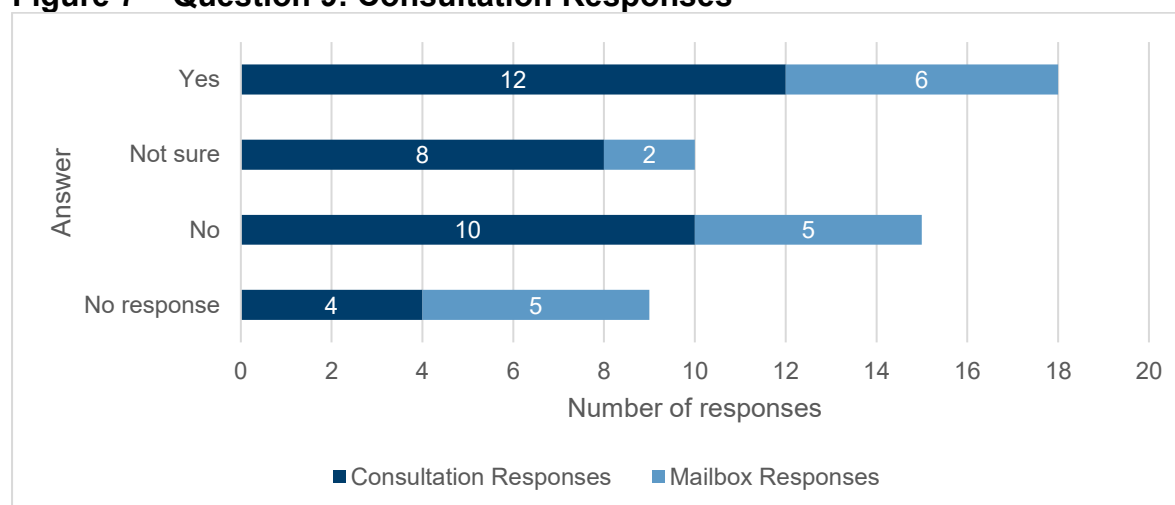
### **Neither agree nor disagree**

One respondent mentioned that the LEIF is well aligned with the principles of the 14 to 16 learner entitlement and the CfW. They felt that the emphasis on broad learning experiences, contextualised data, and learner progression supports a holistic approach to education. However, they also felt that there is a fundamental risk of reinforcing, rather than raising standards if the LEIF is not benchmarked against high-performing systems, normalising lower expectations rather than driving continuous improvement. One respondent also discussed how the LEIF can support higher standards by using international comparisons to strengthen benchmarking and ensure the indicators promote genuine stretch and challenge.

Another respondent mentioned how it is difficult to judge the level of alignment until further information and guidance is released. Specifically, they called for information regarding the “new measures at KS4”, how the Welsh Government plans to report school-level data in the future, and what the reporting requirements will be for schools as the 14 to 16 Learner Entitlement is implemented. They also feel that there is still lack of clarity regarding the new Made for Wales qualifications and whether these will meet the needs of all learners.

**Question 9 - Should there be any additional indicators included in this framework to fully support learning and improvement? Please provide details.**

**Figure 7 – Question 9: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows consultation responses to Question 9, that 18 respondents suggested additional indicators which could be included as part of the LEIF, whereas 15 respondents suggested no additional indicators should be included. Ten respondents were not they were not sure if further indicators should be included, and 9 respondents did not provide an answer to this question.

**Yes**

Overall, respondents who suggested additional indicators could be included as part of the LEIF commented that they felt that the current framework is too 'narrow'. The additional indicators suggested by respondents included how a value added measure, suggested by 7 respondents, could help to assess improvements made to learner progress over time, effectively capturing the impact of teaching on all learners, including those who start from a lower baseline. Two respondents specifically called for value added for vulnerable groups, as they feel they are under-represented in Post-16 data.

Additional contextual data was suggested by 3 respondents including the potential to include demographic information regarding the makeup of the pupil population to effectively contextualise school results and provide information which could inform the judgements of external stakeholders regarding the effectiveness of the school.

Furthermore, the inclusion of wellbeing measures was cited by 2 respondents which suggested that without sufficient wellbeing measures the framework may not effectively capture how well schools are contributing to the emotional resilience of their learners. Suggested wellbeing measures included the use of learner voice surveys or inclusion of wider indications that could reflect learner wellbeing.

Two respondents suggested an average points score for literacy, numeracy and best science grade, the 5A\*/A threshold. Providing a comparison of how each learner has

performed in a non-core subject relative to their performance in the core subjects was also mentioned as potentially useful indicator for self-evaluation purposes. Similarly, 1 respondent called for improved indicators for smaller subjects to avoid misinterpretation of data and reduce the risk of schools narrowing the curriculum, whilst another asked for the inclusion of attendance percentages.

Wider comments included how reducing the 50 entries threshold figure on exam entries would provide a more comprehensive overview to support learning and improvement. One respondent also explained how international benchmarking matters as they feel there is a gap at the systems level in the lack of internationally benchmarked indicators to assess Wales' literacy and numeracy. Councils have also cited the need for a wider strategic conversation about the positioning and use of "Welsh National Tests" (which is understood to refer to Personalised Assessments) and effective data systems at primary level.

In relation to Post-16 planning, one individual, in response to Question 1, felt that career planning would benefit from standard measurements, which could be provided by organisations such as Career Wales, thus reducing the administrative burden for schools. As a means of determining the national occupational and skills needs in Wales, another respondent called for the charting of enrolments onto qualifications, learner destinations and if learners have remained in Wales.

### **No / Not sure**

Respondents who did not indicate further indicators (12) or were unsure regarding the addition of further indicators (11) highlighted the risk of including too many indicators which could dilute their impact and overburden schools in their data collection and reporting requirements. Four respondents mentioned that they believe the current four 14 to 16 learner entitlement components<sup>4</sup> are appropriate and proportionate and align well with the information ecosystem principles

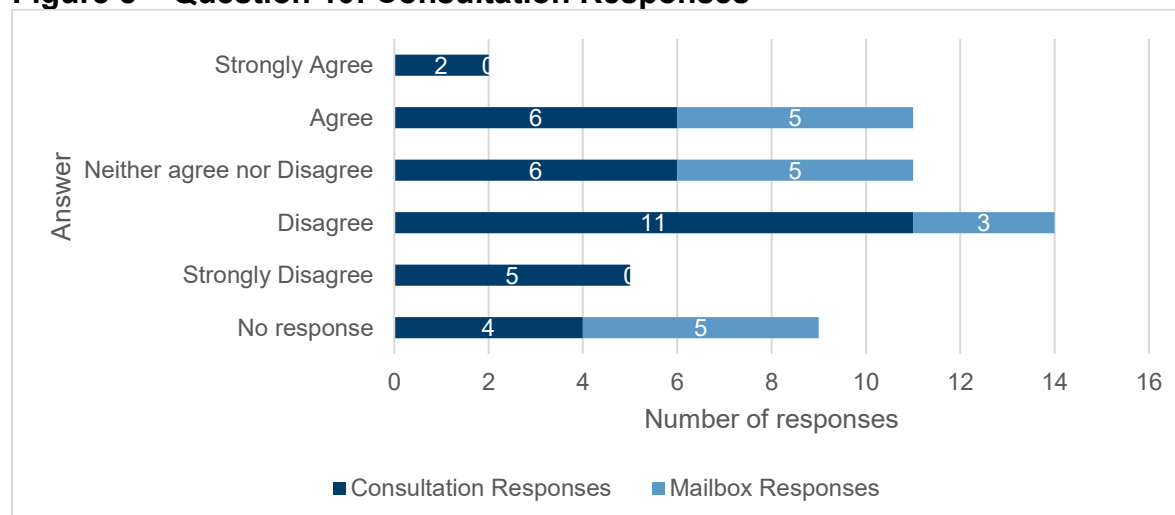
Respondents suggested that teachers and leaders should continue to be engaged in reflection around the proposals and that the proposals could be trialled with a small number of schools, prior to full roll out, to identify any unintended consequences of the new framework early on.

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<sup>4</sup> The four components referred to here are 'qualifications in literacy and numeracy', 'qualifications to encourage breadth', 'wider learning and experiences across the curriculum' and 'reflections on learning and progress and post-16 planning'.

**Question 10 - To what extent do you agree that the organisation of the 14 to 16 LEIF aids a coherent communication of 14 to 16 curricula and learning in schools' own contexts, enabling a meaningful and equitable understanding?**

**Figure 8 – Question 10: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows the consultation responses to Question 10. Overall, the response to this question was mixed but tended towards disagreement with the suggestion that LEIF aids a coherent communication of 14 to 16 curricula and learning. The most common response was respondents who disagreed, with 14 respondents selecting this option. Following this, 11 respondents agreed and a further 11 neither agreed nor disagreed with the question. Finally, 5 respondents strongly disagreed and 2 strongly agreed. Nine respondents did not provide a response to this question.

### **Agree**

Most respondents who agreed did not provide further comment or explanation. Of those who did, they stated that the flexibility in the LEIF will allow schools to contextualise their offer and accompanying standards. One respondent commented that the proposal was “fairer on schools based on context.”

### **Disagree**

In total, 14 respondents disagreed with the question and highlighted a range of concerns regarding the LEIF and its ability to account for different learning contexts and subjects.

Two respondents suggested the LEIF seems a complicated way to report data and concerns was expressed over how will schools be compared if they offer different subjects. It was also suggested by 1 respondent that The LEIF would need to be flexible enough to “reflect each school’s unique strengths rather than forcing alignment with rigid indicators.”

Concern was raised by 1 respondent that the framework may encourage a “narrower focus on numeric data” with the implication being that this data would need to be

sufficiently contextualised for parents and wider stakeholders. To ensure fairness, it was suggested by 1 respondent that the LEIF needs to account for all subjects equally and avoid becoming overly complex or standardised (in the interests of accessibility and understanding) as well as avoiding potential duplication of existing guidance (e.g.: in school prospectuses).

One respondent suggested that the proposed “contextualised measure” is both a threat and an opportunity, which once established, could be linked to funding and ALN provision (in the way that FSM is currently used). Therefore, it was suggested that it is fundamental to get the LEIF indicators right due to their implications on wider decision making. However, 2 respondents also acknowledged the risk that the LEIF is inconsistently implemented and does not “fully capture the complexity and variability of school contexts, leading to inconsistencies in interpretation.”

If smaller cohorts are not reported under the LEIF, it was suggested by two respondents that this could result in smaller (and thus most likely, rural) schools constricting their curriculum, or the reporting of only subjects above the 50 entries threshold could give the impression that their curriculum is narrower than it is in reality to external stakeholders. Respondents raised concerns that the LEIF and proposals to exclude data on smaller cohort subjects could discourage schools from offering these subjects (e.g.: Drama and Music).

Concerns were raised by two respondents that the LEIF is too “ill-defined” to be useful for comparison and that without “coherent standardised testing”, schools could “present their own version of progress”. Schools with more resources may find it easier to demonstrate alignment of their curriculum with the LEIF, disadvantaging smaller schools with fewer resources to demonstrate this.

Finally, 1 respondent suggested that the LEIF could fail to communicate learners’ skills proficiency or deficits in literacy and numeracy prior to starting secondary school due to the lack of reporting of data on pre-secondary assessment levels. It was felt that the focus on attainment grades rather than progress measures could mean schools focus intervention and support for learners on the C/D borderline disproportionately, as well as increase pressure on schools to withdraw pupils from qualifications where they are not likely to reach a C grade.

### **Neutral comments**

One respondent, who indicated they neither agree nor disagree, suggested that whilst the LEIF has the potential to aid communication, it may be too complicated to achieve this result. Another mentioned the LEIF’s strengths as moving beyond a narrow focus on exam results, supporting a broader understanding of school provision. Furthermore, they felt by including wider learning experiences and Post-16 planning, the framework presents a more rounded picture of education rather than just attainment. However, they also mentioned challenges related to risk of oversimplification or lack of comparability and the potential for mixed interpretations. They suggested improvements in supporting the LEIF with clear, standardised guidance for how schools present their contextual data and how international benchmarking data should be incorporated at a system level to provide an external reference point for literacy and numeracy standards.

## **Question 11 - What are the challenges and opportunities in moving to the 14 to 16 LEIF?**

### **Challenges**

Twenty-six respondents suggested further challenges which may occur as a result of the transition to the 14 to 16 LEIF. The full list of challenges cited is outlined below.

Workload pressures were cited as a challenge by 5 respondents, with 3 respondents citing time pressures and one respondent citing staffing issues, including recruitment and retention of staff. This view was linked to perceptions of the 14 to 16 LEIF requiring more time for staff to collect and report data, as well as more time required to adapt to a new system, particularly in the context of wider pressures on the sector.

Five respondents suggested that there was a challenge in ensuring that the data in the 14 to 16 LEIF is understandable to parents and stakeholders, with the potential need for a more simplified breakdown to be offered to parents. Implementation and the managing of changes in moving toward the 14 to 16 LEIF was cited by 4 respondents, highlighting the risk of confusion and inconsistent application across schools in the absence of sufficient training and support with implementation. This included the need for clarity of data and inclusion to ensure that datasets and reporting mechanisms are in place and there is a shared understanding of what is required across all four components of the LEIF.

The 50 entries threshold for subjects at which pupil performance is reported was cited by 4 respondents as a challenge which could discourage schools from offering subjects with smaller cohorts or encourage schools to dissuade learners from taking up certain subjects so that they fall below the threshold for reporting results. Additionally, 2 respondents cited data use and the meaningful interpretation of data as a challenge, particularly if prior attainment is not established, it was felt that schools may struggle to demonstrate patterns of improved performance over time if the context in which schools operate changes and is not accounted for i.e. changes in the school's catchment area.

Conversely, 2 respondents mentioned a risk of reinforcing low expectations as a result of using contextualised data without external benchmarks and inconsistencies in school reporting which could lead to variable interpretations and difficulties in comparison.

Alignment with the CfW was cited by two respondents as a challenge in implementing the 14 to 16 LEIF, with respondents viewing the framework as having the potential to undermine the positive impact the CfW has had to date on the breadth of the curriculum and school culture, due to the potential for externally published data to be misused by schools and contribute to an increase in stress and competition between schools (as cited by one respondent) as well as the risk that the 50 entries threshold could contribute to narrowing of the curriculum as outlined above.

### **Opportunities**

Eighteen respondents highlighted some of the opportunities in moving to the 14 to 16 LEIF. The full list of opportunities cited are outlined below.

Improvements in the flexibility of the curriculum to adapt to learner needs was cited by 3 respondents as a potential opportunity offered by the transition to the 14 to 16 LEIF. Furthermore, 3 respondents suggested that the new framework could enable the collection of more meaningful data based on pupil progress rather than examination results which could support better communication with parents, learners and stakeholders around learner progress.

Additionally, two respondents suggested the new framework could offer the opportunity to improve the data available to support school development without schools 'playing the game' in terms of making changes to their operations i.e. changes to timetables to superficially increase their reported performance against the framework.

The potential to co-design the proposal with educators, was flagged by one respondent. It was suggested that this would enable the Welsh Government to identify the most useful data to collect, and developing user-friendly dashboards with filters (e.g., by year group, ALN status, deprivation level) to support planning and benchmarking. The focus on self-evaluation and improvement and contextualised reporting was seen as encouraging.

A small minority of individual respondents suggested further opportunities for the new framework included the potential for more holistic reporting outside of exam performance (2), including wider learning experiences, well-being and Post-16 planning (1) as well as the potential to offer more targeted support and guidance for learners through the framework (1).

### **Points of clarification**

One respondent raised further points of clarification in response to this question which included the potential timeline for implementation of the LEIF and whether it would align with the staggered rollout of the CfW, offering either a challenge or opportunity to trial new approaches. Secondly the respondent suggested that the publication of Post-16 planning is a wider programme that goes beyond individual schools and requires Local Authority level planning, alongside school level planning to ensure the changes are effectively embedded across Key Stages 3 and 4.

## **Question 12 - What else do we need to consider when we start to align our reporting systems that provide schools and local authorities with datasets and tools to support self-evaluation processes with this public-facing 14 to 16 LEIF?**

### **Additional points**

Additional points were cited by 36 respondents which tended to focus on reliability, and the assurance of data as well as the accountability for communicating data in a way which is accessible to all stakeholders.

Accessibility and accountability were cited as an issue by 16 respondents, who highlighted the importance of the arrangements ensuring that the presentation of the data is clear and accessible to all stakeholders, especially parents, to ensure that external stakeholders sufficiently understand the public data that is being shared and that the data is not used in a way which contributes to increased external pressure on schools. One respondent raised the importance of improving data functionality, utilising interactive user friendly report tools to break down data by gender or disadvantage, enabling a clearer picture of school performance

Additionally, data concerns were highlighted as an issue by 12 respondents, with respondents focussing on how the data provided would be assured to ensure accuracy and that the transparency of the data should be maintained.

Capacity and capability was highlighted as a concern by 6 respondents which suggested that staff may struggle with the adaptation to the new requirements under the 14 to 16 LEIF and suggested that additional support be provided to schools in the form of funded professional training on the changes, as well as support for additional staff time to enable implementation. Some respondents highlighted concerns that data collection would be burdensome and negatively affect staff capacity and lead to “compliance-driven reporting” rather than considered evaluation.

Impact on current practice was expressed as a concern by 4 respondents who highlighted potential conflicts between the 14 to 16 LEIF and existing practise in schools around supporting collaboration, or measuring progression, for example.

Furthermore, timing was expressed as an issue by 4 respondents who noted the need for a careful trial period and sufficient lead-in time to allow for the 14 to 16 LEIF to be embedded into school practice. One respondent noted particular concern regarding the alignment between the LEIF release date in November and other data collection requirements taking place at the same time for Autumn reviews and the impact this would have on capacity for implementation. Conversely, 1 respondent noted the potential benefit of better aligning school and local authority datasets, reducing duplication of data reporting and ensure that schools can easily assess their own performance.

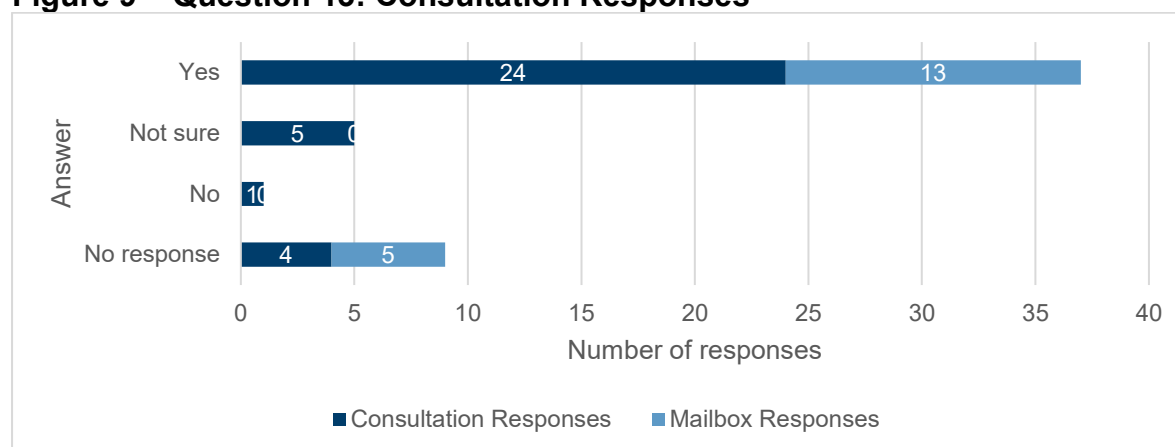
Finally, clarification was sought by 2 respondents regarding certain elements of the proposal. One respondent sought clarification regarding the role of designated qualifications including non-GCSE qualifications in these datasets and how these grades would fit into datasets where qualifications have not been designed for Wales. The respondent noted that given the volume of entries designated



qualifications in Wales that they expect that these qualifications will continue to play an important role in the offer available to learners. Also, 1 respondent sought clarification regarding how learner grades would be reported for qualifications with a single and a double award outcome in subjects such as English.

**Question 13 - Is specific guidance needed around the aspects of the 14 to 16 LEIF where the expectation is on schools to make information available? Please provide details.**

**Figure 9 – Question 13: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows consultation responses to Question 13, of which a majority of respondents (37) suggested that further guidance would be needed on the aspects of the 14 to 16 LEIF where the expectation is on schools to make information available. Additionally, a minority (10) of respondents suggested further opportunities which could be presented by the transition. Additionally, 5 respondents expressed uncertainty, and 1 respondent disagreed that further guidance would be needed. A further 9 respondents did not provide a response to this question.

Of the 23 respondents who provided further comment on this question, 6 can be deemed not directly relevant, with some of these responses focusing on guidance for the wider use of data and information approaches, as opposed to specific guidance on what the school would be expected to publish. Other non-relevant comments included abandoning the LEIF, references to the 50 entries threshold for a qualification and questioning why schools should make any data available at all.

### **Guidance needed**

Respondents recognised the potential benefits of providing general guidelines for reporting and ensuring transparency. This includes helping ensure quality and effective data which captures the nuances of diverse needs within cohorts and reports on learner progress over time, focusing beyond final attainment.

Respondents expressed general concerns about how the quality and effectiveness of data and reporting could be ensured in the absence of guidance and agreed upon definitions. Specific issues highlighted in the absence of guidance included the ability to report on broader learning experiences and ensure consistency of interpretation and implementation across different schools. Specifically, 4 respondents felt guidance should cover precise circumstances and methods of reporting to ensure this.

Wider planning issues was highlighted as a concern which guidance would need to address by 2 respondents. Respondents highlighted the need for guidance on Local

Authority level planning as well as school level information, and across Key Stages 3 and 4, not just Year 11. One respondent suggested that guidance needs to ensure that small cohort subjects are included, to avoid curriculum narrowing.

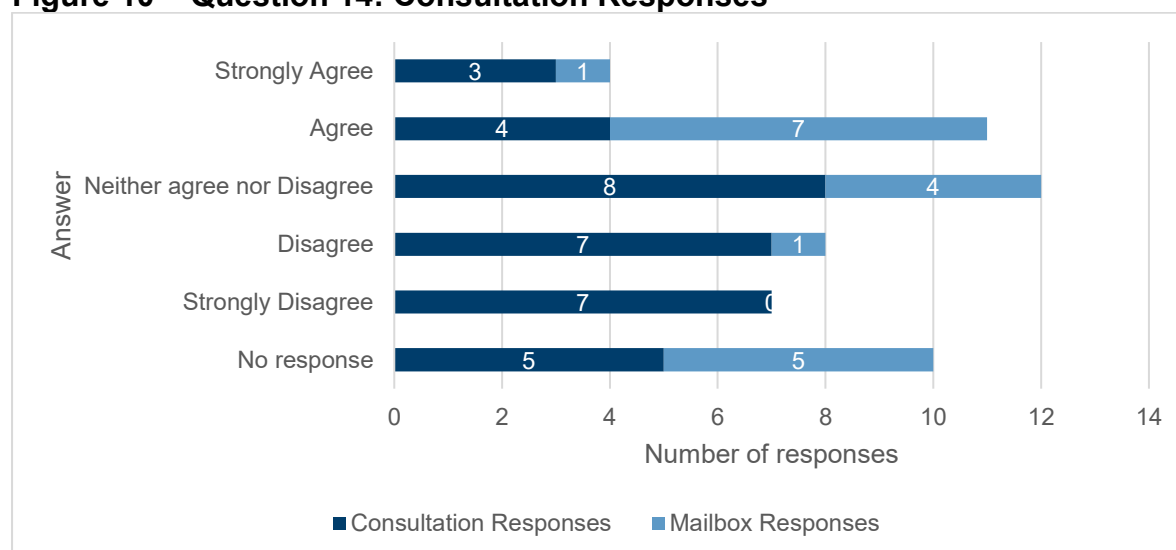
Overall, it was felt that additional information is needed on:

- Expectations for schools and local authorities.
- Modelling of school publication information for consistency.
- Professional learning to support interpretation.
- Use of data and guidance for external stakeholders.
- Reflections on learning and progress and Post-16 planning.

Despite calls for consistency, 1 respondent did claim there should be flexibility within these requirements, and that schools should be free to describe their approach to qualifications and entries practices qualitatively, but it should be substantive. Finally, 2 respondents noted how there should be a provision of suitable context with guidance, including how to present contextual factors without undermining the ambition to drive improvement, not simply comparing schools across Wales.

## Question 14 - To what extent do you agree that the 14 to 16 LEIF supports a focus on the common goals of Cymraeg 2050: A million speakers?

**Figure 10 – Question 14: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows consultation responses to Question 14. Respondents were mixed, with the same number of respondents (15) both agreeing or disagreeing that the 14 to 16 LEIF supports a focus on the common goals of Cymraeg 2050: A million speakers. This consisted of 4 respondents strongly agreeing, 11 agreeing, and 8 respondents disagreeing, 7 strongly disagreeing. A further 12 respondents neither agreed nor disagreed with the question and 10 respondents provided no response. There were also 7 respondents who responded to this question who provided more general responses to Welsh language policy rather than the data arrangements.

### Agree

Of the respondents who agreed or strongly agreed, only a minority provided additional detail to support their answer. Respondents suggested that the LEIF supports the goals of Cymraeg 2050 by including relevant indicators and metrics for Welsh language learning in the framework, both inside and outside of lessons.

One respondent called for data to be based on the cohort of learners rather than the number of entries, so that the data reflects how successfully the provider has developed all learners' Welsh language skills.

Finally, as a separate point unrelated to the LEIF and beyond the scope of the consultation, three respondents stated that upskilling the Welsh Language skills across the whole education workforce will increase the capacity to be able to deliver the aims of Cymraeg 2050, but that this would require significant time and investment.

### Disagree

Respondents who disagreed or strongly disagreed expected the proposals to have no impact on the Cymraeg 2050, with 1 individual deeming there to be insufficient

focus on the flagship policy within the consultation document. Respondents also cited a lack of confidence on its impact due to wider challenges in the sector which were related to Welsh Language policy rather than the data arrangements.

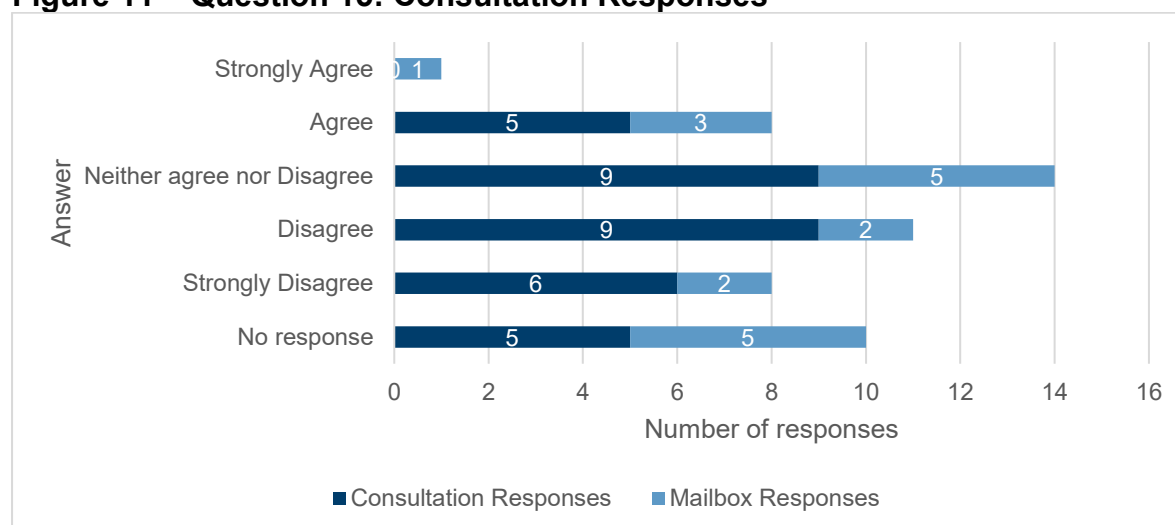
### **Neither agree nor disagree**

Furthermore, most respondents who selected neither agree nor disagree did not provide additional rationale for their selection. However, 1 respondent expressed concern that the requirement for literacy and numeracy reporting in Welsh must be balanced, to ensure that it does not disproportionately increase pressure on learners and teachers in non-Welsh medium schools. Furthermore, 2 respondents highlighted that lower entry figures, that are below the proposed 50 entries threshold, could result in no information being shared over time for Welsh qualifications in English medium schools, jeopardising the ambitions of Cymraeg 2050.

Another 2 respondents felt that the LEIF was unclear how it will significantly contribute to the ambition of Cymraeg 2050. Notably, it was thought that its impact is likely to be limited unless further measures are introduced to track and encourage active Welsh language use and, critically, increase the number of Welsh-speaking teachers in the system, as they felt that reporting alone will not drive increased Welsh language use or fluency.

## Question 15 - To what extent do you agree that the 14 to 16 LEIF will minimise disruption to the workforce and enable focus to remain on delivering for and supporting learners to progress?

**Figure 11 – Question 15: Consultation Responses**



Source: Consultation Responses, n=52

The bar chart shows responses to Question 16, which were notably mixed or uncertain when asked to what extent they agree that the 14 to 16 LEIF will minimise disruption to the workforce and enable focus to remain on delivering for and supporting learners to progress. Whilst 1 respondent strongly agreed with the sentiment and 8 respondents agreed, the most popular response was neither agree nor disagree, with 14 respondents answering with this option. A further 11 respondents disagreed and 8 respondents strongly disagreed, with 10 respondents leaving no response.

### **Agree (with caveats)**

Most respondents who agreed with the question that the 14 to 16 LEIF would minimise disruption to the workforce did not provide additional rationale.

Four respondents who agreed suggested that the 14 to 16 LEIF should minimise disruption to the workforce given there is a focus in using data that is already collected. One respondent suggested that the LEIF would enable teachers to focus more on contextualisation, as well as learner progress, rather than high stakes accountability measures. However, they caveated it would take time to determine to what extent systems put in place for implementation would enable this.

### **Disagree**

Of the respondents who disagreed, 7 respondents expressed concern that the changes would lead to increased 'turbulence' in the workforce. It was felt that the changes would be disruptive particularly in the context of wider pressures and school reform. One respondent noted that staff will need to develop knowledge and expertise of wider qualifications to implement the 14 to 16 LEIF effectively, impacting their workload in the short term. Respondents also suggested that the changes could have negative impacts on the workforce through reduced staff morale (5), and negative impacts on recruitment (2) and retention (1). Furthermore, 2 respondents

suggested that these effects would result in negative implications for learner outcomes.

Two respondents highlighted the need for a trial of the changes prior to widespread implementation to minimise disruption to the workforce, to be followed by long term monitoring over time.

### **Neither agree nor disagree**

Respondents who neither agreed nor disagreed acknowledged concerns around the potential for workforce disruption due to the changes. One respondent specifically highlighted concern that the reporting of small cohorts due to the 50 entries threshold could allow the identification of teachers in smaller schools where there are fewer subjects with more than 50 entries. It was suggested that in these schools the teachers of subjects with more than 50 entries could receive disproportionate pressure regarding performance as their subjects would be the only subjects publicly reported on, with the potential for negative effects on teacher wellbeing for those affected.

Another respondent expected that the 14 to 16 learner entitlement to increase workload in the short term. This included a perception around the need to implement new qualifications alongside wider learner experiences, as well as preparation of school based documents for publication, such as reporting information on religion, values and ethics (RVE), relationships and sexuality education (RSE) and wider learning opportunities. However, it is important to note that in this context they were referring to the curriculum changes relating to the 14-16 learning policy causing workload increase, as opposed to the data proposals outlined in the consultation document.

However, 2 respondents suggested that effective scrutiny, reducing the number of changes after implementation and providing sufficient training to schools could help minimise any potential disruption.

## **Question 16 - What effect will the 14 to 16 LEIF have on the workforce, including the impact it may have on workload?**

This question asked respondents to comment on what effect the 14 to 16 LEIF will have on the workforce, including the impact it may have on workload. Overall, 35 respondents left further comments regarding their answer to Question 16. Comments made in response to this question were mostly general comments in response to the proposals as a whole, which may show a confusion among respondents regarding what the question was asking and how what was being asked differed from the earlier Question 6 regarding the impact of the information ecosystem principles on the workforce.

### **Negative**

Similar negative responses were received as part of Question 6, where respondents listed general comments with limited acknowledgement of the different elements of the proposal being asked about. This included 12 respondents who mentioned the potential for increased workload and parity of workload for teachers in Maths, English, Science and Welsh which are expected to receive disproportionate scrutiny (2).

Increased workload was primarily expected to arise due to the increased administrative burden of senior leaders and teachers being required to make more information publicly available and report against a wide range of indicators, including wider curricula and learning opportunities, learner engagement and wellbeing initiatives and Post-16 planning and transition arrangements. Furthermore, respondents expressed concerns regarding the complexity of data reporting (2), that this would distract educators from their main work with few expected benefits.

Two respondents noted a potential negative effect on the workforce due to a lack of clarity regarding the requirements of the LEIF and how this lack of clarity could potentially lead to an increase in workload. Furthermore, 1 respondent noted that this lack of clarity could result in the 14 to 16 LEIF being inconsistently implemented across different schools.

Overall, respondents raised concerns about the stress and negative wellbeing of staff brought on by the introduction of the LEIF. Five respondents expressed scepticism that staff would have the capacity to adapt to changes, whilst 3 respondents cited its potential to exacerbate ongoing recruitment and retention issues.

### **Positive (with caveats)**

Overall, 5 respondents highlighted potential positive effects that they expected the 14 to 16 LEIF have on the workforce. One respondent noted that they expected that the 14 to 16 LEIF would enable a reduction in high stakes accountability pressure associated with current 'performance-driven measures' and reduce the pressure on teachers and school leaders to present data in a way which meets external accountability demands and lead to a more balanced and contextualised use of data to support more meaningful conversations regarding learning and improvement rather than reactive responses to performance metrics.



However, respondents also highlighted caveats. Four respondents noted that any positive effects on workload would be subject to the 14 to 16 LEIF being implemented 'correctly' with the potential for further simplification of requirements, as well as schools being provided with additional support from local authorities and regional consortia to help manage workload. Two respondents had some queries on 'time sense' and how long it would refer to, and if it would potentially involve any rolling averages over the time period concerned.

### **Suggestions**

Respondents suggested that the Welsh Government would need to invest in additional professional learning support (4) to minimise any negative effects on the workforce and additional staffing (administrative support) (3) to facilitate smooth implementation of the proposed changes.

## **Question 17 - What are your views on the impact of the 14 to 16 LEIF in supporting individual learners and meeting their diverse needs, including those from disadvantaged backgrounds and those who share protected characteristics (as set out under the Equality Act 2010)?**

Half of the respondents (27) provided comments on positive or negative effects they expected on supporting individual learner needs as a result of the 14 to 16 LEIF. Of these, 11 respondents cited expected negative effects, and 9 respondents cited potential positive effects, with further caveats highlighted regarding what would need to be in place for positive effects to materialise. A further 7 respondents who referred to their response given to Question 7, suggesting again that comments were made regarding the proposals in general rather than in response to specific elements of the proposal.

### **Positive**

The focus on self-evaluation, flexibility and evidenced-based decisions was cited as potential positive effects of the 14 to 16 LEIF, as they feel it could enable schools and local authorities to better understand and respond to barriers faced by vulnerable learners, offering the potential to be made 'genuinely learner-focused.' and if delivered 'as intended' communicate a more holistic view of learner progress based on specific measures.

### **Negative**

Respondents who listed potential negative effects of the 14 to 16 LEIF doubted its potential to support individual learners, suggesting it would not address the contextual and structural issues which affect capacity to support diverse learner populations, and raised concerns that data would 'drive' the direction of decision-making in schools. It was felt by respondents that not all diverse learner needs were considered as part of the 14 to 16 LEIF with some protected characteristics under the 2010 Equality Act not being included in the data collection and so would not be open to scrutiny regarding potentially divergent learner outcomes.

One respondent felt that the needs of learners in Catholic schools had not been sufficiently considered noting that the importance of religious studies within the 14 to 16 curriculum and that the 14 to 16 LEIF arrangements do not account for data sharing and reporting to the diocesan authorities and does not recognise the role of the church as a provider of schools.

Possible unintended consequences raised by respondents included that standardised indicators and reliance on data could result in decisions made to support broad provision needs (which could risk overlooking diverse needs of learner populations and challenges faced by disadvantaged learners).

### **Caveats**

Two respondents had mixed views regarding the potential for the 14 to 16 LEIF to support diverse learner needs, offering caveats to their responses which set out the conditions that would need to be met for the 14 to 16 LEIF to have a positive effect on meeting diverse learner need. These included the need for a central mechanism to track learners Post-16, acknowledging that this becomes more challenging as

destinations and vocational pathways become more divergent, and its effectiveness in supporting diverse learner needs would be dependent on the suitability of individualised measures and indicators.

**Clarification**

Finally, 2 respondents sought further clarification, suggesting that they felt that they did not have sufficient information to answer the question. One respondent questioned how the premise of the question linked to the 14 to 16 learner entitlement.

**Question 18 - What, in your opinion, would be the likely effects of the overall approach to using data and information in the school system and the information ecosystem principles on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?**

Overall, there was a mix of views, with respondents both highlighting the opportunity for the principles to promote bilingualism more actively, as well as identifying practical ways to mitigate potential adverse effects on the Welsh language. Some of the responses to this question, Question 19 and Question 20 included references to all three questions. As a result, these responses have been included in the original question answered by respondents.

### **Opportunities to Promote Positive Effects**

Respondents highlighted that the principles of reporting and publication i.e. publishing data on achievement levels in Welsh qualifications, alongside explicit links to Cymraeg 2050 goals, would raise the profile of bilingual skills. Respondents suggested that such practices could visibly demonstrate a school's commitment to providing a bilingual environment and signal the importance of bilingualism to learners, parents, and wider communities. In addition, several respondents argued that more systematic reporting on performance in Welsh qualifications could encourage schools to maximise the number of entries into Welsh-medium qualifications and focus on improving performance levels.

### **Opportunities to Mitigate Negative Effects**

Despite recognition of the opportunities to promote positive effects, respondents also cautioned that for these positive effects to be realised, wider system challenges must be addressed that go beyond the principles. This included the current recruitment crisis for Welsh-speaking teachers and the need for wider professional development. It was stressed that ensuring a sufficient and skilled workforce is essential for the delivery of Welsh language qualifications at the required scale and quality. Although not directly in relation to the specific data proposals, a respondent raised a concern around the continued dominance of English in schools, even among pupils who are fluent in Welsh, viewing it as a significant barrier to achieving parity between Welsh and English.

In response to these challenges, there were calls for the Welsh Government to clearly articulate the purpose behind any data collection related to Welsh language use and progression (something that the Welsh Government have endeavoured to do as part of these proposals). Respondents stressed the need to avoid misuse of this data for narrow accountability purposes. Investment in staff training and piloting new systems was seen as essential to support implementation effectively.

Respondents emphasised the need for a deeper cultural shift in schools, alongside more nuanced and holistic ways of measuring progress in promoting the Welsh language.

**Unsure or No Impact Predicted**

While most respondents saw opportunities for positive effects, 2 respondents expressed uncertainty about the overall impact. Some indicated that they did not believe the principles were likely to have a meaningful impact, either positive or negative, on the Welsh language. Another respondent similarly suggested that at this stage, it was difficult to envisage any impacts that could be meaningfully quantified.

**Neutral Views**

A local authority response believed that the likely effects of applying the information ecosystem principles to the Welsh language would be neutral overall. However, they suggested that Welsh language outcomes should be included in reporting, even where cohort sizes fall below the current '50 entries threshold'. It was suggested that this would enable better monitoring of Welsh language achievement and allow for more targeted interventions where needed.

**Question 19 - In your opinion, could the overall approach to using data and information in the school system and the information ecosystem principles be formulated or changed so as to: - have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

There was a lower level of engagement to this question from respondents which asked whether the overall approach to using data and information in the school system and the information ecosystem principles could have an effect on the Welsh language. Of the 13 respondents who answered this question, there were a further 9 respondents who were not sure, and a further 4 who referred to their responses to previous questions, 2 to Question 14 and 2 to Question 18. Some of the responses to this question, Question 18 and Question 20 included references to all three questions. As a result, these responses have been included in the original question answered by respondents.

**Opportunities for Positive Effects**

Most respondents who answered the question felt that the approach to using data and information has the potential to generate more positive outcomes for the Welsh language, particularly if implemented with targeted support. There were strong calls for bilingual data reporting and the provision of bilingual resources, both of which were seen as essential to ensuring the equal treatment of Welsh and English across schools.

Four respondents suggested that the framework could be strengthened by including qualitative indicators, such as cultural engagement and participation in extracurricular Welsh language activities. This was linked to a broader emphasis on measuring cultural change and everyday language use, not just through formal qualifications or formal lessons, as key to achieving long-term language goals.

However, 1 respondent felt that a stronger focus on qualification and attainment levels could support national goals for the Welsh language, by ensuring that learners are both accessing and succeeding in Welsh-medium qualifications. Furthermore, it was noted how there is very limited information on how many learners continue their studies through the medium of Welsh across key stages or phases of education. One respondent suggested that publishing such data, both at the school and local authority level, would be valuable. They also recommended collecting and reporting data on how many learners are pursuing qualifications through the medium of Welsh (other than Welsh language itself). They felt that providing visibility over these figures would help track the progression and development of Welsh-medium education over time.

Overall, the data framework itself was viewed by many as a potential driver for positive change, encouraging schools to place greater emphasis on the Welsh language, especially in contexts where engagement has historically been limited.

### **Risks of Negative Effects**

However, some concerns were also raised. While respondents were generally supportive of the direction of the proposals, several concerns were raised about potential negative effects, particularly around the threshold of qualification entries for data reporting. Two respondents noted that the current 50 entries threshold could have unintended consequences for Welsh language qualifications. Specifically, they cautioned that in English-medium schools, where entry numbers into Welsh-language qualifications may be lower, this threshold could result in no information being reported over time. Similarly, in smaller Welsh-medium schools, lower numbers of entries into specific qualifications could mean that important data about Welsh language provision and attainment is not captured or shared. Respondents stressed that these risks need to be addressed to avoid inadvertently disadvantaging the visibility and monitoring of Welsh language outcomes.

Furthermore, 1 respondent noted that publishing data on Welsh as a second language may not actually promote language equity and could even have unintended, counterproductive effects. More broadly, the challenge of ensuring true equality between Welsh and English was seen as complex and still unresolved, despite ongoing efforts. Notably, 3 respondents believed that the approach is unlikely to have any meaningful impact.

**Question 20 - What, in your opinion, would be the likely effects of the 14 to 16 LEIF on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?**

This question provides evidence in showing that there was a more positive outlook on providing more Welsh language based opportunities, yet there were some concerns with the existing opportunities and that more of a focus on creating a “cultural shift” may be beneficial. However, many of responses received were external to the specific question being asked, so findings have been presented as more general comments referencing the use of the Welsh language in 14 to 16 education settings.

**Positive effects**

Thirteen respondents mentioned positive effects on the Welsh language. Respondents focused on ensuring Welsh language had enough space within the curriculum to be focused on adequately, as well as recruiting sufficient Welsh language teachers to meet the necessary requirements. Two responses suggested that any proposed changes should aim for greater clarity, streamlining and reduced variability. Another 2 responses suggested that Welsh should be encouraged in general school life, such as in corridors and within activities. Supporting schools with bilingual resources and tracking language progression may encourage this overall.

Three respondents agreed that there will be more parity for learners in Welsh medium schools in terms of the qualifications available. A respondent noted that including Welsh across the Welsh continuum of learning, as opposed to Welsh medium schools and settings, only will ensure that all schools are able to celebrate their learners’ progress in both Welsh and English.

One respondent felt that there is a need to develop a coherent and connected system of qualifications that are flexible and valued by learners and employers alike. They explained that there was a need to have a workforce in place with sufficient Welsh language skills to be able to successfully deliver and assess these qualifications.

**Negative effects**

Four responses mentioned mitigating the negative effects. This includes a wider point made in relation to the current lack of fluent Welsh speakers as a barrier to implementation, as opposed any specifics around data reporting. It was also felt that the new Welsh qualification needs to have more careful handling; perceptions of it being difficult or boring could deter engagement.

One respondent mentioned how an increased emphasis on creating a meaningful “cultural shift” where Welsh is valued and naturally adopted could help. This was explained as ‘care is needed when using the new qualification - the fact that the new



qualification is difficult, unrealistic and boring, is going to have a negative impact, in my opinion.'

**Question 21 - In your opinion, could the 14 to 16 LEIF be formulated or changed so as to; have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or - mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

Four respondents touched on the limitations of current metrics within the framework. One respondent suggested that LEIF may not fully capture the day-to-day use of Welsh, especially in Welsh and English-medium settings, where informal language use can be harder to measure.

To address this, there was a call from 1 respondent for practical guidance to help schools track and report on Welsh language progression more effectively. Embedding this tracking within wider school improvement strategies was seen as vital. A more joined-up approach—following learners' language journeys across different streams and schools—could help sustain Welsh-medium study and support long-term language retention.

Encouraging bilingual reporting was also suggested to ensure that Welsh language outcomes are visible, particularly in schools with small cohort sizes, such as Welsh-medium or dual-stream settings.

One response acknowledged that while the LEIF framework is designed to ensure equal treatment of Welsh and English in relation to reporting standards and the publication of data in both languages, achieving this in practice is challenging due to staffing shortages. In particular, the difficulty in recruiting Welsh-speaking teachers was highlighted as a significant barrier. As 1 respondent noted, that the LEIF treats both languages equally, and should ensure that schools also do, but they feel that, some schools do not have the staff to meet this requirement.

One suggestion was that the LEIF must explicitly highlight the importance of Welsh language qualifications as part of the overall learner entitlement. By doing so, the respondent felt this would encourage schools to prioritise Welsh language education and support the wider national ambitions to strengthen the use of Welsh across education and society. Respondents also noted that the focus of the LEIF on qualifications and attainment levels could play an important role in supporting national goals, particularly if schools are incentivised to offer and promote a broad range of Welsh-medium qualifications and pathways.

Additionally, 1 respondent highlighted a significant gap in the current availability of data on the continuity of Welsh language study. At present, little information is available on how many learners continue their studies through the medium of Welsh as they transition between Years 9 and 10. It was suggested that the LEIF should ensure the publication of data on these progression rates, as well as on the number of learners following qualification courses (other than Welsh language itself) through the medium of Welsh. Improving data transparency in these areas would enable better monitoring of Welsh-medium education pathways and help to identify areas where additional support or intervention might be needed.

Finally, beyond qualifications, 2 respondents emphasised the importance of fostering confidence and engagement with the Welsh language—recognising that cultural connection and positive experiences are key to sustaining its everyday use.

**Question 22 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.**

Additional comments were provided by 14 respondents, focusing on a range of views which were both relevant and less relevant to the consultation questions being asked. There was a misunderstanding conveyed by respondents who highlighted concerns about publishing school performance data, which may lead to performative or manipulative behaviour. This is despite the consultation document clearly stating its intention to avoid a performance-based, accountability system. Respondents also stated a preference a private platform for analysis and collaboration, and stress the need for consultation pilot testing, and alignment with the CfW.

One respondent understands that a single public/professional version is seen as unworkable; it can be too complex for the public and too simplistic for professionals.

One respondent criticises the lack of prior consultation with the profession and relevant associations before releasing the proposals, whilst another respondent called for greater emphasis on Welsh language education in primary schools to produce more fluent speakers.

One respondent emphasised the need for pilot testing, and more of a phased rollout. This would allow for a chance to identify risks and avoid workload burdens. This respondent also called for clarity of purpose, data privacy, and more investment in professional learning. They warned against data being used for accountability or competition, which they believe undermines collaboration and learner wellbeing.

Another respondent had concerns about misleading accountability pressures, leading to "gaming" (e.g. focusing on borderline pupils). They explained, as many others have done, that the 50 entries threshold may distort data and incentivise manipulation. They also felt that the lack of aggregated subject performance data makes meaningful comparisons difficult. This point was also repeatedly raised by respondents in relation to a range of consultation questions.

One respondent mentioned how current proposals may contradict the spirit of the CfW by over-emphasising measurable outcomes. They outlined risks in increasing teacher workload, harming staff wellbeing, and deterring recruitment. They felt that disproportionate pressure may fall on core subjects, creating inequity and stress for both staff and learners.

One respondent mentioned how RSE and RVE teaching varies significantly between schools which can make it difficult to standardise reporting or assess consistent outcomes across Wales. They feel that making definitions clear on measuring outcomes for these subjects will be challenging.

It was noted by one respondent that proposals should not be put forward without a Workload Impact Assessment being undertaken first as concern remains on workload for teachers and stakeholders.

Questions remained on how local authorities can support schools in identifying key strengths and areas for development if the proposals result in schools producing different content. Questions remained on how local authorities would use this information, given the amount and variation of data across all schools.

There were also queries on what information would be available for stakeholders such as further education providers and employers around the overall pupil attainment requirements for next steps in their progression pathways, also linking to professional development opportunities to ensure that educators have the correct training for delivery.

One respondent felt that the principles of the LEIF have the potential to create a more balanced and sustainable approach to data use in schools. However, without careful implementation, clear guidance, and investment in digital tools, they feel there is a risk of increased workload for school leaders and teachers. To make the system truly workforce-friendly, efforts must focus on streamlining processes and minimising duplication.

Where the anticipation is that schools publish information on their websites on their support discussions around planning and identifying options, careers planning, facilitating work experience and employer engagement, how they secure participation and how successful they are in this, there was a common view is that schools should be issued with clear guidelines on what as a minimum they will need to publish to ensure a consistent picture across Wales. Though many remained broadly supportive of the approach to the development of indicators for destinations data to report on past cohorts that have progressed into education, employment, training or none of these.

Finally, 1 respondent felt that using FSM as a proxy measure for children from a disadvantaged background is problematic. They explained that it is not clear what is meant by eFSM in the overall consultation, as it is unclear how this is beneficial for measuring performance indicators.

## Conclusions

This report provides a summary of responses received to the Welsh Government consultation on proposals for an approach to using data and information in the school system to support learning and improvement and the 14 to 16 Learner Entitlement Indicators Framework. The consultation ran between January to March 2025 and received 34 responses to the public consultation, and 19 responses via the Welsh Government mailbox. One of these mailbox responses was identified as being a duplicate response.

The 22 questions asked as part of the consultation gave the opportunity for respondents to provide extensive feedback on the consultation topics covered. However, the consultation received a range of negative responses, often focused on issues outside the scope of the consultation or based on misinterpretations. Additionally, a pattern emerged where respondents expressed agreement with certain statements but then provided only negative supporting comments.

To support direct engagement, the Welsh Government held 12 events with school leaders across Wales, with around 600 secondary school leaders in attendance. Within these events, a workshop was arranged to consider the use of data and information, with a particular focus on 14 to 16 learners, as well as the LEIF - approximately 150 of the attendees attended this workshop (across the 12 events). Despite this, overall feedback on the proposed changes was mixed, partly due to lingering concerns tied to past experiences of defensive or competitive performance cultures.

Overall response levels were low, and many replies reflected confusion about the proposals. Some respondents addressed issues better suited to other consultation questions, particularly early on, with commentary focusing on specific indicators in the LEIF rather than the broader principles of the information ecosystem. In such cases, the analysis prioritised the most relevant answers for each question when summarising the data.

The following emerging key themes were identified as part of the consultation:

### **Agreement with the Information Ecosystem Principles**

- Broad support for the information ecosystem principles as a result of their broad, balanced nature and alignment with the Curriculum for Wales (CfW).
- Coherency with the ethos of the CfW, particularly in encouraging a move away from reductive performance measures and focusing on wider learner progression beyond academic metrics.

### **Barriers to Supporting Learning**

- Socio-economic factors and deprivation are significant barriers, but not the only ones affecting learner progress.
- The lack of standardised testing before age 16 hinders accurate self-evaluation and accountability in schools. This was also mentioned in the

context of information to support transition and to represent the value added in secondaries.

### **Curriculum and Assessment**

- Concerns about the narrowing of the curriculum, with a focus on literacy and numeracy data at the expense of creative subjects.
- The exclusion of small cohort subjects from indicators could limit curriculum diversity.
- The need for a value added measure to track learner progress over time, rather than relying solely on attainment results.

### **Data Collection and Reporting**

- Clear concerns over the 50 entries threshold for publication of awards data, plus concerns of risk of schools gaming the system with a high-stakes ramification of the 50 entries threshold, with implied unfairness between schools with different cohort sizes and inconsistency.
- The complexity and volume of data required by LEIF could increase administrative burdens on schools.
- There is a risk of data being used for unintended accountability purposes, increasing stress and competition.
- The importance of ensuring data is meaningful and accessible to all stakeholders, including parents and learners.

### **Anticipated impacts on workforce and workload**

- The proposed changes and relating to data collection and reporting were categorised as a risk in terms of perceived increase in workload and pressures on staff, potentially negatively affecting their wellbeing.
- Specific areas of risk identified included the disproportionate focus on bigger subjects, the interpretation of the indicators as creating an environment of accountability and cross-school comparison and the perceived complexity in terms of the format for reporting data for self-evaluation purposes. The requirement to report bilingually on equal terms was also seen as a factor that would inevitably result in an increased burden on staff.

### **Clearer Guidance**

- There were calls for clearer guidance on how the information ecosystem principles would be practically implemented in schools, especially regarding the use of contextual data.
- Clearer guidance would ensure transparency and consistency in reporting in order to maintain data quality and effective reporting, particularly when reporting on broader learning experiences and ensuring uniform implementation across different schools.
- Challenges were found in communicating the consultation aims with external audiences due to the relatively technical nature of the proposed framework and indicators. Further tools will need to be explored to enable future communication in a meaningful and contextualised way with external audiences.

### **Welsh Language Impact**

- Respondents highlighted the LEIF's opportunity to enhance the Welsh language through stronger curriculum integration, better staffing, inclusive qualifications, and a more bilingual school environment.
- Challenges highlighted, although lying outside of the scope of this consultation, included a shortage of fluent Welsh-speaking staff and a broader need for a cultural shift to increase the natural use and value of Welsh among learners.
- Although partly outside of the scope of the specific questions posed in this consultation, some suggestions focused on improving data tracking, offering clearer guidance, enabling bilingual reporting, addressing resource gaps, and explicitly prioritising Welsh within the framework to support national language goals.



## **Annexes**

### **Annex A – Methodology**

Following the creation of a research framework and database, consultation responses were manually coded and analysed by at least two researchers on a question-by-question basis and subsequently coded using thematic analysis. Common themes and patterns were drawn out and highlighted, with researchers collaborating to produce a comprehensive summary of responses. All responses were analysed in the language medium of submission, meaning that Welsh responses were analysed in the medium of Welsh to allow for full and nuanced understanding of the meaning of the responses. Where respondents cross-referenced earlier elements of their responses or repeated content verbatim from question to question, the first instance of this response was prioritised in analysis. Consultation responses were processed and analysed using Excel and the mind-mapping software Miro. All categorical questions were analysed using Microsoft Excel Pivot Tables and bar charts were created to present the connections in the data.

Where a duplicate response was identified as being received, whilst working on behalf of the Welsh Government we have a duty to report the breadth of feedback received from a formal consultation, it is not necessary to quantify that breadth. Therefore, the response that is identical in content is only reported once and therefore has not been given any more weight than a unique response.

To supplement the formal consultation, other engagement was undertaken with priority groups. Twelve leadership events were held with attendees encouraged to submit a pro forma response following the event. The numbers of attendees submitting responses was lower than anticipated and therefore notes were taken during the event by the Welsh Government to capture the sentiment of attendees. Feedback from internal engagement has also been captured through a pro forma. Feedback from this additional engagement outside of the main consultation is being analysed separately but will supplement the findings from the consultation responses.

## Annex B - Consultation Questions

**Question 1** – To what extent do you agree that the overall approach to using data and information in the school system and the information ecosystem principles align with the ethos and ambitions of our Curriculum for Wales?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 2** – To what extent do you agree that the information ecosystem principles support a proportionate use of data and information to support evaluation and improvement (an approach that keeps the learner at the centre and does not encourage a performative and accountability-driven system)?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 3** – To what extent do you agree that the information ecosystem principles support a sustainable use of data and information to support evaluation and improvement?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 4** – To what extent do you agree that the information ecosystem principles allow for a balanced and holistic understanding of schools and learning by external audiences, such as parents and carers?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 5** – Are there any other principles or aspects to the proposed information ecosystem principles that should be added?

**Question 6** – What effect will the information ecosystem principles have on the workforce, including any impact they may have on workload?

**Question 7** – What are your views on the information ecosystem principles supporting individual learners and meeting their diverse needs, including those learners from disadvantaged backgrounds and those learners who share protected characteristics (as set out under the Equality Act 2010)?

**Question 8** – To what extent do you agree that the 14 to 16 Learner Entitlement Indicators Framework (LEIF) aligns with the 14 to 16 Learner Entitlement while supporting our wider Curriculum for Wales ambitions?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 9** – Should there be any additional indicators included in this framework to fully support learning and improvement? Please provide details.

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 10** – To what extent do you agree that the organisation of the 14 to 16 LEIF aids a coherent communication of 14 to 16 curricula and learning in schools' own contexts, enabling a meaningful and equitable understanding?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 11** – What are the challenges and opportunities in moving to the 14 to 16 LEIF?

**Question 12** – What else do we need to consider when we start to align our reporting systems that provide schools and local authorities with datasets and tools to support self-evaluation processes with this public-facing 14 to 16 LEIF?

**Question 13** – Is specific guidance needed around the aspects of the 14 to 16 LEIF where the expectation is on schools to make information available? Please provide details.

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Not sure</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 14** – To what extent do you agree that the 14 to 16 LEIF supports a focus on the common goals of Cymraeg 2050: A million speakers?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 15** – To what extent do you agree that the 14 to 16 LEIF will minimise disruption to the workforce and enable focus to remain on delivering for and supporting learners to progress?

<b>Strongly agree</b>	<input type="checkbox"/>	<b>Agree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>	<b>Disagree</b>	<input type="checkbox"/>	<b>Strongly disagree</b>	<input type="checkbox"/>
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**Supporting comments**

**Question 16** – What effect will the 14 to 16 LEIF have on the workforce, including the impact it may have on workload?

**Question 17** – What are your views on the impact of the 14 to 16 LEIF in supporting individual learners and meeting their diverse needs, including those from disadvantaged backgrounds and those who share protected characteristics (as set out under the Equality Act 2010)?

**Question 18** – What, in your opinion, would be the likely effects of the overall approach to using data and information in the school system and the information ecosystem principles on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

**Question 19** – In your opinion, could the overall approach to using data and information in the school system and the information ecosystem principles be formulated or changed so as to: have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

**Question 20** – What, in your opinion, would be the likely effects of the 14 to 16 LEIF on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

**Question 21** – In your opinion, could the 14 to 16 LEIF be formulated or changed so as to: have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

**Question 22** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.