

Response to *Our qualifications – our future*

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Introduction

1. ColegauCymru welcomes the opportunity to respond to the Welsh Government's consultation *Our qualifications – our future*. ColegauCymru represents the 16¹ further education (FE) colleges and FE institutions in Wales.² In 2011/12, there were 214,850 individual students attending college and 229,615 enrolments.³ We are happy for our response to be placed in the public domain.
2. Colleges are major providers of general education provision in Wales, helping to produce some of the best learner outcomes. Colleges are the predominant providers of funded vocational and technical education in Wales, providing about 85% of the total provision. Colleges are therefore well placed to comment on the future of both vocational and general education qualifications in Wales.
3. ColegauCymru welcomed the publication of the Report of the Review of Qualifications in November 2012 (hereafter 'the Review'). ColegauCymru and individual colleges made a significant contribution during the Review's consultation process. ColegauCymru itself hosted a conference in February 2012 on behalf of the Welsh Government. We also gave oral evidence to the Review in July 2012 and made an extensive written submission to the review in August 2012. The report of the review team reflected a number of the points that ColegauCymru had raised in its submission. We were therefore pleased to endorse the thrust of the recommendations of the Review.
4. Since then, we have been working directly with the government on the development of some of the key measures proposed in the Review, such as in relation to the revision of the Welsh Baccalaureate Qualification (WBQ). ColegauCymru has continued to play an active role in the development of the new qualifications regime in Wales through membership of the Welsh Government Stakeholder Reference Group and other bodies. In all of these discussions we seek to place the interests of learners first.
5. It is crucial that the issue of the portability of qualifications is considered in relation not only to work and study across the UK but also within the wider European context.
6. This agenda will become increasingly important and it is therefore encouraging that the Welsh Government is seeking to align its developments with European frameworks, including the European Qualifications Framework (EQF), the European quality assurance in vocational education and training (EQAVET), European credit system for vocational education and training (ECVET) and in relation to the Validation of Informal and Non-formal Learning (VIL).

¹ The 16 include Coleg Harlech/WEA N; WEA South; YMCA Community College; and Merthyr Tydfil College, University of South Wales.

² In this paper the terms 'FE college' and 'college' are used to cover FE colleges and FE institutions.

³ *Further Education, Work-Based Learning and Community Learning in Wales 2011/12 SDR 48/2013*, Welsh Government (March 2013).

7. ColegauCymru serves as the National Contact Point for these European frameworks on behalf of the Welsh Government.
8. ColegauCymru believes that the extent of cross-border employment and business investment requires that Wales ensures that its qualifications are recognised as robust and relevant. The retention of the title and philosophy behind the current A-levels and GCSEs is thus welcomed, as is the proposal to continue with the current approach to vocational qualifications via UK awarding organisations.
9. At the strategic level, we endorse the position taken by the government to place 'world-class skills' at the heart of curriculum and qualifications reform. This chimes clearly with the policy advice from international organisations such as the OECD and the European Commission. The focus on world-class skills also fits well with the requirements of employers. Ensuring that the curriculum and qualifications provide the right knowledge and skills for life, employment and lifelong learning is crucial for future generations.
10. Finally, there is clearly a need to dovetail the design and aims of qualifications with the revised curriculum at Key Stage 4 and below. The experience for post-16 learners should be one that naturally develops from their experience of, and attainment in, school allowing progression pathways to be properly joined up. This is one of the key aims of the 14-to-19 agenda in Wales and is relevant to the government's stance on qualifications in Wales.

Q1. Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

11. Barriers to the effectiveness of our current system are fourfold:
12. The first includes the lack of 'critical mass' in the qualifications market to ensure that qualifications provided by awarding organisations meet Wales' needs in terms of context-specific subject content, regulatory requirements (such as in relation to the Care Council for Wales) and our linguistic environment. Although many awarding organisations appreciate the need for such tailoring of qualifications, it is not always economic for them to provide qualifications for these needs. This is a weakness of the current system.
13. A second weakness is in the arrangements for three-country (Wales, England, and Northern Ireland) regulation of qualifications, the system that has prevailed since devolution. Divergent policy agendas in recent years have meant that there has been little commonality in the approach taken to qualifications reform within the three countries. In some instances it appears as if the UK Government has not properly consulted with the other two countries on the future of important qualifications such as GCSEs and A-Levels. This demonstrates the need for an effective qualifications agency and regulator that can put the needs of Wales' learners first.

14. The third weakness to the current system is the lack of resource and capacity for *quality enhancement* in qualifications. This is a crucial agenda that Wales has not pursued with the requisite attention and resources in the current arrangements. We are pleased that quality enhancement is one of the touchstones proposed in *Our qualifications – our future*.
15. Finally, the current system has not yet addressed certain structural issues relating to the funding of education and the ways that performance measures relating to qualifications differ between types of providers. This was a key point brought out by the Review itself (recommendation 41). ‘Successful completion’, for example, is a key measurement for colleges but not schools. These differing requirements are contained in the government’s data collection systems - the Lifelong Learning Wales Record (LLWR) for colleges and other providers, and the Pupil Level Annual School Census (PLASC) for schools. We welcome the Education and Skills Minister’s recent announcement that the Welsh Government will develop and implement a consistent set of performance measures for the post-16 sector.⁴ This is a matter of priority as it affects the ability of learners to properly assess their options at the age of 16.

Q2. Are there any specific features in the current system that you would like to see retained?

16. ColegauCymru values the cross-border brand of certain three country qualifications (A-levels, GCSEs, some vocational qualifications) as these are well known by employers in the UK - and by some employers across the globe. It may be unduly risky for Wales to move away from such well known brands without a strong (alternative) rationale. This is also the case in relation to some vocational qualifications, which have established themselves as brands in their own right with widespread recognition from employers and HE providers. We also note that costs involved in designing and providing the full range of vocational and technical qualifications on a Wales-only basis would be disproportionate and prohibitive. We therefore welcome the continuation of these qualifications brands.
17. The current system of having a significant element of non-terminal assessment in both GCSEs and A-levels is also one that merits retention. Although there may be some exceptions to this rule, our stance is that linear general education qualifications would not necessarily equip learners with an appropriate set of skills to allow them to progress into work or higher education. We note that most higher education courses in the UK now include a significant element of non-terminal assessment and that the world of work revolves around work streams being delivered on an ongoing basis rather than through examinations. Although the nature of the subject area will mean that the degree of formative (non-

⁴ [Cabinet Decision](#) dated 12 November 2013: “Development of consistent performance measures for post-16 learning”.

terminal) assessment will vary quite widely (from art on the one hand to pure mathematics on the other), we uphold the principle of assessment outside of examinations in a one or two year qualification.

18. ColegauCymru supports the retention of the AS level in Wales. We are open to arguments about the precise size of the AS level - as long as this qualification still 'adds up' to a substantial qualification in its own right. Employers and higher education institutions value the AS level and have not welcomed its abolition in England. This point was reinforced during the contributions of senior representatives from the universities of Cambridge and South Wales at the Welsh Government's Qualifications Conference on 11 December 2013. ColegauCymru is responding to the separate Welsh Government survey on this matter.
19. ColegauCymru supports retaining the Credit and Qualifications Framework for Wales (CQFW) as the overarching framework for all qualifications for 14-to-19 year olds. Credit can and should be used flexibly as the currency by which learning is compared and recognised. The emphasis on the importance of attaining recognised qualifications for employers should not crowd out the importance of credit as a key mechanism, such as in relation to prior learning or informal learning. The structure of vocational qualifications in the QCF does allow the sort of flexibility in relation to core and optional units that can be useful to building a flexible learning pathway for learners and to employers. We note the forthcoming independent evaluation of the CQFW and will seek to play a constructive role in providing evidence to the evaluation team.

Q3. What are your views on our proposed vision for Qualifications Wales?

20. The vision outlined in the document is well thought through and credible. It sets out a regulatory structure and wider approach that should equip Wales well for the future. It will retain the strengths of the current system while adding key functions such as quality enhancement that should allow Wales to take forward important strands of work ensuring that qualifications in Wales are relevant, up to date in subject content, well structured in educational terms, and suited to the needs of employers and higher education providers in Wales and beyond. Generous legal powers will have to be provided to Qualifications Wales at the outset in order for it to be able to develop its role appropriately over time.
21. ColegauCymru supports the general thrust to reduce the number of qualifications on the approved list of fundable qualifications. We approve of the process that is already underway to reduce the number of qualifications on the database of approved qualifications in Wales (DAQW). However, we do not believe that a lower number of qualifications on DAQW should, in itself, be the key indicator of success for Qualifications Wales. Colleges would still value a degree of choice in the qualifications they use, particularly in relation to vocational qualifications. Provided that this choice is meaningful and not excessive we believe that Qualifications Wales would be acting reasonably in reducing the number of

qualifications on its approved list for funding, but retaining a range of fundable qualifications in key areas. There is clearly a balance to be struck.

22. The consultation document is right to point to the importance of making professional support available to teachers and lecturers in Wales (in para.4.8) in order to deal with the new qualifications regime. New qualifications require proper training and preparation.
23. An appropriate teachers' qualification framework for further education is also key to ensuring that teacher training addresses the needs of Wales. These are matters of real importance.
24. ColegauCymru would be pleased to assist the Welsh Government with these necessary developments.

Q4. What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

25. ColegauCymru supports the proposal that Qualifications Wales become the key awarding organisation for general education qualifications over time. The proposal to 'phase in' the introduction of the awarding organisation function (para.5.36) is a sound one as any risk of disruption to learners must be avoided. It would be better to get the new system right than to introduce it according to a fixed or pre-ordained timescale.
26. On the operational level, Qualifications Wales will have to exercise its discrete functions (gatekeeping, review and quality assurance, awarding qualifications) in ways that give confidence that there is no conflict of interest for the organisation. We say more about how this may be done in governance terms in our response to the next question.
27. As outlined in our introduction to this response, ColegauCymru considers it important to ensure that Qualifications Wales is able and equipped to ensure that our qualifications are fully compatible and aligned to key European frameworks for qualifications. As Wales' National Contact Point for the European qualifications frameworks and credit programmes, ColegauCymru offers its support to Qualifications Wales. This is a key issue for Wales and many people wishing to work or study in the EU would benefit from qualifications that were recognised in other parts of Europe. (see para 5.30 of the consultation document.)
28. One important function not mentioned (apart from a short reference in para.5.33) in *Our qualifications – our future* is a clear and specific mandate to work cooperatively with other regulators in the UK when issues of common interests arise. It will be important to ensure that the three country qualifications brands remain real and credible in spite of the substantive policy differences that are developing between Wales, Northern Ireland and England. The role of

Qualifications Wales in working with other statutory regulators such as the Care Council for Wales will also be important. The Care Council's own duties in relation to approved qualifications will need to be carefully coordinated with Qualifications Wales.

29. The other omission in the consultation document is the lack of powers for Qualifications Wales in relation to apprenticeships. Apprenticeships fell outside the scope of the Review of Qualifications but it would be unfortunate if this meant that Qualifications Wales will not have a role in relation to apprenticeships frameworks. Although the funding and commissioning of apprenticeships should remain the responsibility of the government, it would be worth actively exploring the idea that Qualifications Wales should be enabled to give a recognised award or qualification to those who have successfully completed an apprenticeship framework. This would help reinforce the importance and status of vocational qualifications vis-à-vis general education qualifications.
30. There is also a partial lack of clarity on where the qualifications policy making function resides in the new arrangements (apart from a short reference in para.5.4). We assume that the Minister will retain the right to make overarching policy, leaving Qualifications Wales to implement policy. However, there is sometimes a fine line to be drawn between policy making and implementation in the area of qualifications approval and it would therefore be helpful for a *modus operandi* to be developed between Qualifications Wales and the government on certain complex issues where policy and implementation are not so clearly separable. Some scope for the delegation of limited policy powers in some areas of detail may be appropriate.

Q5. What are your views on the proposed governance arrangements for Qualifications Wales?

31. The proposed governance arrangements are appropriate. Some have questioned how the regulatory functions and awarding roles may be squared within single awarding organisation. It will be crucial to develop a credible and robust system to separate the two appropriately in order to ensure that public confidence is sustained. This could be done in a variety of ways in organisational terms.
32. Within Qualifications Wales it may be appropriate to have different reporting structures, cost centres and lines of accountability to deal with its separate functions. It may, for instance, be appropriate for the Head/Director of Qualifications Regulation to be accountable directly to the Chair of the organisation rather than the Chief Executive.
33. We might also suggest that the Chair of Qualifications Wales should be appointed by the Minister under the Nolan principles, on a fixed and non-renewable term, and that the appointment should be subject to scrutiny by the National Assembly for Wales in order to ensure her/his independence.

34. In terms of cost centres, Qualifications Wales may choose to exercise its public regulatory functions *only from those resources directly provided by the government*, rather than use revenue gained from its awarding organisation function. This would help inspire public confidence in the way that the agency exercises its discrete functions. Either way, it will be important to learn from best practice in Scotland and in Europe as to how to build appropriate and effective 'Chinese walls' within a body that both regulates and awards qualifications.

Q6. What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

35. The focus on quality enhancement for qualifications is a particularly important one as there is clearly a need to update qualifications appropriately to keep pace with the need of a quickly evolving occupational environment in many areas.

36. ColegauCymru suggests that Qualifications Wales be empowered to conduct Thematic Reviews (on the model of Estyn's practice) which would enable it to look broadly at the provision of qualifications in a particular sector or subject area. This would enable the organisation to range widely across awarding organisations to take a view as to whether there is market failure (or shortcoming) in a particular area. This is particularly relevant in relation to the provision of qualifications through the medium of Welsh or provision in some niche vocational or technical areas.

37. We note that since the release of the *Our qualifications – our future*, UK Government policy in relation to National Occupational Standards and apprenticeships has developed considerably. It will be important that Qualifications Wales is fully appraised of these developments and is able to recommend to the Welsh Government the best policy response for Wales in the area of qualifications.

Q7. What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

38. As stated in response to Question 5 above, it will be vital to put in place strong internal structures to separate the functions of Qualifications Wales in relation to the *awarding* of qualifications, *assuring* the quality of qualifications and *enhancing* the quality of qualifications. We have set out some initial ideas above on how that might be achieved.

39. Furthermore, Qualifications Wales may want to ensure that this internal structuring of functions is validated through a proper internal audit process. A strong internal audit function may thus be required in the new organisation. This may in turn be overseen periodically by the Wales Audit Office which may wish also to ensure that no undue cross-subsidies operate within the organisation that may compromise the public credibility of the regulatory functions of the organisation.
40. Public confidence can only be secured if people are aware of the new qualifications system in Wales and of its robustness. This will require a concerted, high profile and sustained communications campaign to ensure that parents, learners and employers are made fully aware of the new body and its constitutional independence from political interference. This will be a challenge given that most people in Wales predominantly consume England-based media. ColegauCymru is keen to work with the Welsh Government on this point as communication relayed via education providers themselves may well be a key route through which relevant and accurate information about the new qualifications system may be conveyed.

Q8. How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

41. The key impact is the impact on learners' lives and careers. This must be at the heart of all qualifications reform. ColegauCymru believes that learners will benefit considerably from having a qualifications system that:
- facilitates progression to a higher level of educational attainment
 - helps equip learners with a suite of world class skills en route to a rewarding career, and
 - helps learners succeed in a global economy.
42. Benefits to employers, providers and other stakeholders all flow from these benefits to learners.

Q9. 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.

43. We welcome the indication in para.5.43 of *Our qualifications – our future* that the charging model for Qualifications Wales will be reviewed. ColegauCymru would wish to work with the new organisation to ensure that education providers and the government (whose funding pays the candidate entry fees for qualifications in part) get the optimal value for money from the qualifications taken by learners.
44. Colleges incur exam costs that account for around £12m annually or over 7.4%⁵ of Welsh further education non-pay spend and, therefore, the issue is one that clearly needs addressing. ColegauCymru has been discussing this matter with awarding organisations but is now awaiting a decision on the future examination structure in Wales. We would welcome a clear policy from Qualifications Wales (once established) in relation to ensuring that candidate fees are proportionate and represent good value. This would allow investment passed to colleges from the government to focus effectively on the frontline, which is a shared goal for all parties.

⁵ Based on sector non-pay expenditure of £161,911m for 2011/12.