

The Review of Qualifications for 14 to 19 year olds in Wales

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Introduction

This paper has been drawn up by ColegauCymru / CollegesWales in response to the consultation by the Welsh Government on its Review of Qualifications for 14-19-year-olds. ColegauCymru represents the 19 FE colleges and institutions in Wales¹. The content of this paper has been considered by further education (FE) college principals and senior curriculum managers in Wales.

ColegauCymru is pleased to have the opportunity to respond to the Review team's consultation on the future of qualifications for 14 to 19-year-olds in Wales. The announcement of the review was welcomed by ColegauCymru, and colleges have endeavoured to participate as constructively as possible in the review process. We are grateful to the Review team for the opportunity to have made the following contributions to the Review and look forward to making further contributions as appropriate prior to the conclusion of the review later in 2012. ColegauCymru has thus far:

- given initial oral evidence to the Review team (Dec 2011)
- organised a major conference in Cardiff City Stadium on the Qualifications Review (in association with the Welsh Government) in February 2012 which included contributions from Huw Evans and Professor Alison Wolf. Feedback from the conference has been given to the Review secretariat (Feb 2012)
- presented evidence to the Review team with Welsh Government (WG) officials on a project relating to Learning Area Programmes (May 2012)
- given oral evidence to the Welsh Government on its commissioned FE-HE progression project coordinated by ColegauCymru (May 2012), and
- given oral evidence to the Review team on 11 July 2012 in Newtown.

College leaders generally favour pursuing carefully considered reforms to the qualification system for 14 to 19-year-olds in Wales on the basis of carefully assessed risk for future learners. We propose significant reforms to the qualification system in line with some of the changes proposed by the Review team in its consultation paper, such as in relation to the Welsh Baccalaureate and programme based funding for post-16 learners.

ColegauCymru sees the Review of Qualifications as an opportunity to improve the qualifications offer for learners in Wales. We are reassured that the way that

¹ In this paper the term 'FE college' or 'college' is used to cover the FE colleges and FE institutions in Wales.

qualifications reforms are being considered in Wales is both evidence-based and inclusive, and that is not being conducted on the basis of media pressure. We hope that this report will steer a clear and constructive path for Wales for the next decade and beyond.

Following the request of the Review team, we proceed to consider the eighty questions set out in the consultation paper in turn.

Part A

Question A2.1

- i) *Do you agree with the vision and principles set out at A2.1?*
 - ii) *What, if anything, would you add or change?*
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The Review team's consultation paper captures well the key principles concerned with the various issues under consideration.

There are, however, three particular areas where ColegauCymru would wish to supplement or enhance the principles outlined in A2.1 in the consultation document. These are ensuring that the recommendations of the Qualifications Review:

- assist learners in progression to a higher level of learning and/or into sustainable employment and a career (including therefore a greater emphasis on transferrable skills)
- engender a greater (and much needed) parity of esteem between general education qualifications and vocational qualifications in Wales, and
- contribute to social justice and equality by helping, in the medium to long term, to address Wales' wide educational inequalities.

Question A2.2

How could the qualifications system be made simpler and more coherent?

One of the ways in which the system could be made more coherent, as we will outline further in this response, is by making the Welsh Baccalaureate Qualification (WBQ) an overarching framework qualification for learners generally in Wales.

ColegauCymru believes that qualifications as such should not be seen in isolation from students' wider learning journey in a broader sense (including work experience, extracurricular activities and other skills acquired in the education system). This is why we see advantages to moving to a programme-based system of funding learners in post-16 education and the use of the WBQ as an overarching framework for learners' achievements. In this way, qualifications should be seen not an end in themselves but as part of a programme of learning that enables the student either to progress further in their lifelong educational journey and/or to gain sustainable employment in a fulfilling career.

Clear qualifications/overarching programmes brands are also helpful in achieving a coherent system. Recognition of those qualifications brands as conveying something which is credible and robust is important for employers and for education providers to whom learners may progress (such as universities).

We also see advantages in there being a generally reduced number of qualifications available in Wales without impinging on the legitimate variety of vocational qualifications which reflect the diversity of vocational trades and the variety of specialised job roles that exist in the 21st century labour market.

It is worth highlighting that the development of the provisionally entitled Learning Area Programmes (LAPs), if adopted by the Welsh Government in relation to funding policy, may indirectly assist in the rationalisation of the number of qualifications in use in Wales through the work of so-called 'Validation Panels' (effectively all-Wales professional learning communities). Such panels would provide an opportunity to share good practice in the use of qualifications with a focus on coherent programmes of learning for students. This focus on programmes of learning may well 'tighten' the use of qualifications within FE colleges and schools in Wales, helping to provide a more coherent qualifications 'offer' for students.

It may be appropriate for such Validation Panels (or whatever nomenclature is used to describe their work) to be given an explicit remit by the government to reduce the number of qualifications used in a relevant learning area, as we believe that the range of qualifications needs to be trimmed in the interest of learners.

Question A2.3

- i) *Should we retain existing brands such as GCSE, A level and vocational qualifications (such as BTECs, OCR Nationals or City and Guilds) in Wales, in the short to medium term?*
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College leaders generally see merit in retaining the existing principal qualification brands: they are well recognised and understood. Changing the qualification brands without changing the substance of the qualifications would be unlikely to achieve anything other than a diminution of the recognition of the qualification in the short term, especially in a relatively small qualifications market such as Wales. Question A2.3 itself raises the wider issue of the future currency of the major qualifications in Wales, and this matter is addressed in response to questions A3.2 to A3.4.

If the brands are maintained in Wales there is a strong case for clarifying and reinforcing the equivalence of vocational and general education qualifications by prefacing them by

their level; such as by describing GCSEs in future as 'Level 2 GCSEs' or A-levels as 'Level 3 A-Levels' and 'Level 3 BTEC Nationals'. This would be an important and helpful move in Wales and other parts of the UK if adopted.

Question A2.4

- i) To what extent does the current suite of qualifications at 14–19 sufficiently encourage the development of literacy and numeracy?*
 - ii) To what extent does the current suite of qualifications at 14–19 provide clear information about an individual's literacy and numeracy?*
 - iii) Please give reasons and any other comments.*
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In the main qualifications, such as GCSEs and A-Levels, it tends not to be literacy or numeracy that is specifically tested as such, but more the knowledge or competency of the subject area and the application of knowledge in that discipline (although we note that the latest revision of GCSE Maths in 2010 may help in testing numeracy more than its predecessors).

Teachers need to be in a position to help those students who may be on course to achieve adequate marks in general Maths and English qualifications but whose underlying literacy and numeracy skills are poor. This is part of the wider challenge of addressing the holistic needs of the learner rather than exclusively 'teaching to the test'. As previously reported to the WG and the Review team, a significant proportion of entrants into FE colleges at aged 16-18 score poorly in literacy and numeracy diagnostic assessments, including some who have achieved recognised qualifications (e.g. GCSE) in Maths and English. One of the answers must therefore be that general qualifications for Maths and English, particularly at level 2, should contain within them elements that properly assess the literacy and numeracy skills of learners. The same arguments apply to the level of literacy in the Welsh Language GCSE (first language).

The role of Essential Skills Wales (ESW), focuses on communication, ICT and the application of number, is not to be underestimated. It is perhaps a little too early to judge exactly how well ESW has addressed the challenge of literacy and numeracy. However, it is fair to say that ESW has not immediately helped engineer a noticeable improvement in literacy and numeracy skills as far as many college lecturers are concerned.

Question A2.5

- i) *Should there be a stronger external element in the assessment and/or quality assurance of all qualifications (through one or more of the methods suggested at A2.5)?*
 - ii) *Please give reasons and any views on the types of external elements that should be involved in different circumstances:*
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External assessment offers significant advantages in that it adds rigour and confidence to the qualifications system. As such, external assessment is a desirable principle. At the same time it must be acknowledged that methods of assessment and the form of externality employed in assessment must reflect the learning methodologies of the programme of study that leads to the qualification outcome.

Different courses of study will therefore require different forms of external assessment. An overall summative assessment is appropriate in some areas as might multiple choice questions, which can easily be externally verified through samples of assessment papers. In other cases, there may be benefits to there being a clearer distinction between formative and summative assessment, or for there to be time-restricted supervised assessments carried out in school/college (rather than unsupervised assessments that are completed in students' own time). Clearer rules on tutor intervention before and during the assessment process may also clarify matters.

Standards of assessment must also take into account the particular requirements of Welsh-medium study and the specific challenge of identifying competent Welsh-speaking external assessors in particular vocational areas. We return to this issue later in this response (see response to Q 2.7).

If external assessment were to be more generally implemented across the board there would be a need to improve the CPD and training on offer for external assessors in order to ensure appropriate rigour across the board.

- iii) *Should the volume of assessment at 14–19 be reduced?*
 - iv) *If yes, how could this be achieved?*
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The general view of college leaders is that the volume of assessment for general qualifications is excessive. As we suggest in later questions (response to Q 3.4), this may be addressed by reducing the number of assessments within the principal general education qualifications and by limiting the number of resits allowed. Making greater use of programme assessments rather than end of unit assessments is another way in which this may be achieved.

Question A2.6

How can the qualifications system help engage and motivate all learners?

Three factors often cited as to why learners may better engage with their learning programme (or conversely become disengaged):

- The lack of contextual learning in some programmes of study is often cited as a reason why a learner fails to take sufficient interest in his/her study. Less abstract syllabuses with greater relevance to the workplace may help address these concerns. This is something that could in theory be addressed by a qualifications/curriculum framework.
- Digital learning can help kindle or sustain interest in subjects. Young adults currently access digital media on a prodigious basis. Ensuring that this mode of engagement is pursued in their studies may assist in ensuring that their interest in their school or college work is maintained. It might also be useful to consider making greater use of ICT or other media for supervised assessment.
- In STEM subjects there remains concern that the reduction in 'hands on' learner experimentation (owing to a number of factors including health and safety regulations) has contributed to some students being less engaged by those subjects.

Question A2.7

What are the key issues relating to Welsh-medium provision of qualifications at 14–19?

Some of the key issues relating to Welsh-medium provision of qualifications are:

- The lack of availability of vocational qualifications available in Welsh by awarding bodies. This partly relates to the size of the market. There are also costs to delivering these qualifications through the medium of Welsh.
- The shortage of tutors / lecturers who can act as external verifiers or moderators of vocational qualifications through the medium of Welsh.
- How Customer Service units such as WJEC's Iaith ar Waith or Agored Cymru units can be fully and properly integrated within vocational qualifications to ensure that learners have a basic ability to communicate with their customers and colleagues.

- The need for more learning resources available in Welsh, including online resources, of which there is insufficient quantity and quality. We are looking forward to the forthcoming national online resource, Hwb, in the expectation that it will build upon the Welsh-medium resources available on NGfL and develop into a key user-friendly portal with a greatly expanded repository of up-to-date Welsh-medium resources.

Question A2.8

i) How might we best ensure that qualifications are fit for purpose?

Qualifications need to meet the principles set out in A2.1 and the supplementary principles we have outlined in answer to question A2.1. In short, qualifications are fit for purpose if they:

- engage learners' interests and help learners realise their personal career goals
- meet employers' needs (public, private and third sectors), for example through the integration of transferrable key skills into the curriculum and qualifications
- provide opportunities to progress to a higher level - in education or at work
- meet wider aspirations in terms of the appreciation of equality/diversity, bilingualism, critical thinking, and compassionate values and in helping to create 'rounded' citizens.

The qualifications system and the curriculum more widely have an enormous number of bases to cover. It is therefore difficult to impose a single template for qualifications. Added to this are the intrinsically different forms of learning methodologies employed in different areas of study – including differences between the various modes of assessment between vocational and academic areas and indeed *within* those areas.

ii) How could evidence about the destinations, outcomes and progression of learners in relation to qualifications be improved?

Reliable information on learner destinations and outcomes is critical to ensuring that learners are well equipped to choose the right programmes of study, knowing the career options that can result.

The challenge is to capture learners' longer-term progression, rather than simply progression up to six months after they leave a learning provider. The circumstances of

young people, in particular, can change significantly after they complete their studies at college or school and the first few months may not be a reliable indicator of a young person's career path. The dearth of destination data is an issue that affects all learning providers (schools, FEIs, private learning providers). We suggest it would be helpful to establish a destinations tracking system covering all sectors and which would enable meaningful comparisons to be made. The introduction of Unique Learner Numbers may be of some assistance in this respect. Other suggestions include following-up young people using digital media including social networking sites such as Facebook or smartphone applications.

A 'whole system approach' to the destination of young people would be desirable but at the same time any new system will have to provide value for money in terms of human and financial resources given the financial constraints on learning providers in the coming years.

A number of the issues at stake in the question of destination data can be found in the Welsh Government Social Research Paper (authored by Old Bell 3 and Dateb), *Scoping Study into the Use of FE Destinations Data* (2012).

Question A2.9

- i) *To what extent should young people be able to take qualifications when they are ready rather than at an expected age?*
- ii) *Please give reasons and any views on how this might be achieved:*

College leaders welcome a 'learner centred' approach to the age at which students take key qualifications. This, to a certain extent, already reflects current good practice in FE colleges and FE institutions in Wales. It is apparent that learners develop at a different pace and episodes in individuals' lives may militate against the achievement of particular qualifications at fixed ages. That being said, general parameters for attaining level 2 and 3 qualifications can give learners something to aim for and can help structure the learners' journey through the publicly funded education system.

This is important not only for the learner but also because the level of public support for education is different for under- compared to over-19s (in relation to European law). Instituting a delay on a widespread basis to the completion of either level 2 or level 3 qualifications might require careful legal considerations.

On balance, this should be a matter for permissive guidance from government and learning providers should be awarded discretion to determine, in discussion with the learner, at what point assessments should be undertaken, but with the retention of a

general norm that level 2 qualifications should be taken at 16 and level 3 qualifications at the age of 18. Without any general age norm, there may be some 'drift' among some less motivated learners.

iii) Should we retain external qualifications (such as GCSEs) at 16 in Wales at least in the short to medium term?

iv) Please give reasons.

With reference to the arguments advanced above we consider that GCSEs should generally be sat by the age of 16 in Wales in the short to medium term. An external measure of attainment at 16 provides a helpful guide to the progression opportunities that should be highlighted to the learner.

Question A2.10

i) What do you perceive to be the needs of Wales in relation to qualifications at 14–19?

Further to the answer outlined in A2.8 more generally, we would wish to highlight the importance of improved Labour Market Intelligence (LMI) in helping learners, education providers and careers advisers in Wales make decisions or give advice on progression routes or careers paths that are based on sound evidence and usable intelligence.

We hope that recent steps taken by the Skills Intelligence and Strategy Branch of DfES will help provide some of this intelligence, and ColegauCymru is working with DfES officials to ensure that this is relayed to providers and learners in the most appropriate way. LMI is not a simple matter to survey or interpret in a fast moving market-based economy. Nonetheless, we are of the view that the current level of LMI does not enable the advisers nor those charged with making choices to do their job in the most helpful way.

Finally, it is imperative that Wales have a qualifications system that helps improve its educational performance on the global stage, such as that measured by the OECD's PISA. Concerted efforts must be made to address Wales' underperformance in PISA. Appropriate qualifications can play a role in dealing with this priority.

- ii) *To what extent do you think that qualifications at 14–19 should be allowed to diverge from those in England, in order to better meet the needs of Wales?*
- iii) *Please give reasons for your answer and state whether your views apply to all qualifications or some particular types.*
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College leaders are less concerned with the issue of divergence or convergence with England *per se* than they are with the needs and interests of learners in Wales, and the effect of changes to qualifications on the ability of education providers to meet learners' needs.

Policies on qualifications in England appear to be fluid. They change quickly and frequently and are consequently a moving target. We are not fully aware of exactly how, when or whether various policy initiatives will be implemented in England. We are therefore not in a position to be able to recommend that Wales diverges from / converges with England as a matter of principle.

ColegauCymru shares the concerns expressed in the correspondence from the Education Ministers in both Wales and Northern Ireland (reported on 1 August 2012) to the UK Government's Secretary of State for Education regarding the lack of consultation and communication with the devolved administrations on the future of England, Wales and Northern Ireland qualifications. This lack of information and the apparent rapidity of developments in England makes the work of the Review of Qualifications team in Wales (and its consultees) particularly difficult. It affects both general and vocational qualifications.

Question A3.1

- i) *What are your views on the content, delivery, relevance and value of the current Welsh Baccalaureate Qualification?*
- ii) *What are your views on the further development of the Welsh Baccalaureate Qualification as the overarching qualification for Wales?*
- iii) *In what ways would you like to see the Welsh Baccalaureate Qualification changed or developed?*
- iv) *To what extent should the Welsh Baccalaureate Qualification be universally adopted by learners in Wales?*
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In general, colleges consider the WBQ to have had a positive impact. It can motivate learners and helpfully broaden the learning experience for vocational as well as

academically inclined students. Praise is strongest for the Foundation and Intermediate stage. The Advanced level does also have consistent advocates. The project-based work, the use of team-working in learning and the skill facilitation involved in the WBQ have all delivered benefits for learners. The various independent evaluations of the WBQ have each borne out these benefits.

That said, we have previously reported a particular issue in relation to the progression of Key Stage 4 learners from the intermediate level WBQ. Learners moving to a vocational programme of learning at college at the age of 16 may have already attained WBQ Intermediate at school as part of an academic programme of study. However, because of the different skill sets required on a vocational programme, it is often the case that they are enrolled onto a vocational programme at college at the same level – level 2.

The post-16 options in the WBQ need looking at again despite the introduction of the new post-16 WBQ. The broader issue of whether the WBQ Advanced Diploma is the full equivalent of an A grade at A-Level for the purpose of entrance into higher education is clearly a matter of some discussion currently. ColegauCymru has also raised with the WJEC the issue of the Welsh language not being included as part of the Wales, Europe and the World section in the pilot post-16 vocational WBQ, starting in September 2012

More generally, ColegauCymru can see distinct advantages to the Welsh Baccalaureate Qualification being used as the framework qualification for learners in Wales within a broader system of programme-based learning and funding.

ColegauCymru believes that a review of the WBQ in 2013/14 could allow recommendations on its future shape to be taken forward in time for its tenth anniversary in 2015. The review should examine the nature of the Learning Core and how its general adoption as an overarching framework qualification might affect the Options in the WBQ. It could also consider whether stronger moderation of the Core would be helpful. In particular, if the WBQ were to be adopted as a general framework qualification *and* if programme-based learning were also to be introduced there would need to be greater flexibility in the WBQ Core at each level, given that some programmes of learning would likely and necessarily be at variance with the current formulation.

We also suggest that the decennial review could helpfully consider whether to introduce an Entry Level WBQ. There are those who consider that it would be helpful to bring together under the WBQ brand a framework for entry level certificates and skills qualifications.

The WBQ name and brand itself might also be a matter for discussion in the decennial review – some argue that if the WBQ were to become the key overarching qualification it

should be rebranded in order to establish a break from current practice and to address any misperceptions people may have about the WBQ (or its lack of grading at Advanced level). ColegauCymru would be pleased to participate in any such review.

Question A3.2

i) *Which of these three options for qualifications at 14–16 do you feel would best meet the needs of learners in Wales? (Please delete as appropriate.)*

Completely new, high-quality and rigorous qualifications (not called GCSEs) for 14 to 16-year-olds that reflect the curriculum in Wales.

or

For Wales to retain the brand name of GCSE, but to develop Wales-only, high-quality and rigorous GCSEs to reflect the curriculum in Wales.

or

For Wales to adopt GCSE developments as and when they emerge in England.

ii) *Please give reasons.*

ColegauCymru believes that qualifications in Wales should reflect the needs of Wales' learners and the wider requirements of our economy and society. Consequently, most college leaders consider **option 2** the more appropriate, where the GCSE brand and its broad (current) nature and content are retained, albeit with the introduction of some changes in order to reflect Wales' specific needs. On the other hand, some college leaders see advantages in the first option; with a new Wales-only qualification at 16 and 18 (or a Wales and Northern Ireland and/or Wales and Scotland qualification) that does not involve specific reference to the extant English GCSE or A level qualifications.

Two reasons are generally cited for favouring option 2. Firstly, that there is not sufficiently convincing evidence base to justify making redundant the concept of GCSEs and their broad structure. It is argued that a major change to qualifications should follow an evidence base that demonstrated a clear need for change. Secondly, there would be a risk to cross border recognition by employers and education providers of a new Wales-only qualification. There is a concern that during the transition period to a new Wales only qualification, the perceived credibility of the new qualification would be uncertain - even if the substance of the qualification itself were robust. This is of particular concern given the number of learners in Wales that progress to higher education or employment in other parts of the UK at some stage in their life. The issue would be compounded if, at the same time, some parts of the media and some employers perceived (rightly or

wrongly) England to be moving to a more academically 'rigorous' basis to its level 2 and 3 qualifications than Wales.

As noted above, the moving target that is England's policy on qualifications for 14-19 year olds impacts on this consultation on the Review of Qualifications in Wales. Before making long-term decisions about the future shape of qualifications for this age group in Wales, the Welsh Government may wish to seek or at least await further clarifications from the UK Government and/or Ofqual on how it proposes to change GCSEs and A levels in England. A convocation of a formal Joint Ministerial Committee of the four UK Education Ministers (under the Memorandum of Understanding agreed by the four UK Governments in June 2011) to discuss the future of 14-19 qualifications should now be considered a priority.

Question A3.3

- i) Are A levels fit for purpose for young people in Wales at 16–19?*
 - ii) Please give reasons for your answer.*
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A levels are widely respected as academic qualifications that prepare students for a range of academically oriented higher education courses. They have maintained their currency as a passport to university thanks to their rigour and assessment method. In general, most college leaders in Wales wish to see the retention of the A level brand. They do not wish to see them replaced with a Wales-only qualification.

On the other hand, the academic nature of A levels does not make them the best vehicle for those students who flourish only where a mix of more flexible and adaptive learning methodologies is available.

Some colleges see the advantages in a more thoroughgoing reform (such as that proposed in 2004 for England by Mike Tomlinson) that would replace A levels with a single Diploma spanning vocational and academic qualifications.

The introduction of the WBQ alongside A levels has gone some way to address this. Nonetheless, many college lecturers report that students still feel that only A levels allow progression into higher education. While this is clearly not the case, given that a range of vocational qualifications also provide recognised pathways into higher education, this misperception is indicative of the continuing lack of parity of esteem between academic and vocational qualifications. It further indicates that learners' choices are distorted at the age of 16 in that some feel compelled to study AS/A level courses after GCSEs even if the method of study is not best suited to them. Finally, a year later, when they attain

low grades at AS levels, they may switch to a vocational or other course – often at level 2.

In our view, a key recommendation from the Review team should be the proposal of a well thought through **publicity campaign and ongoing Action Plan agreed jointly by awarding bodies, the government, colleges, employers, universities and schools in Wales promoting the relevance of vocational education** and dispelling recurrent myths about it. Such a campaign should build on the success of the annual Vocational Qualifications (VQ) Day. The precursor to VQ Day was first established in Wales and the Day has received strong support from Welsh Ministers. It celebrates the success of learners taking vocational subjects and is now firmly placed in Wales's education calendar.

The use of digital media and social networking media will clearly be a key part of any campaign.

Question A3.4

What are the key issues in relation to vocational qualifications in Wales?

Many of the key issues in relation to vocational qualifications in England set out in the Wolf Review of Vocational Education also have some relevance to Wales, although as the Review team notes, there has not been as a great a proliferation in the number of 14-16 vocational qualifications in Wales compared to England.

At 14-16 some of the key issues to note include the mismatch between the availability of vocational courses in schools and the availability of specialised staff to deliver those courses. Cooperation between schools and FE colleges under the Welsh Government's Learning and Skills (Wales) Measure has gone some way to addressing some of these issues but clear challenges remain.

Applied themes in vocational education in particular for this age group are also important - not least because many pupils find the pre-16 curriculum somewhat disengaging, with many 16 year olds emerging from compulsory education without the necessary skills to hold down a job.

Level 1 and 2 vocational courses for 14-16 year olds need to be understood as tasters that engage learners and motivate them to progress to further learning – either in full time education or in work-based learning. There is a misperception in some quarters that a student with a level 1 or 2 qualification in, say, hairdressing or childcare, is a fully qualified hairdresser/childcarer. However, just as a GCSE in maths does not qualify the

holder to teach maths at a school, neither does a level 2 in a vocational qualification bestow upon the holder a 'licence to practise'.

At the 16-18 age level some of the key issues raised by colleges in relation to vocational qualifications include:

- the need to ensure that each and every vocational qualification has clear routes to employment or progression to a higher level of learning and does not become a way of 'warehousing' learners unduly for the purpose of public funding
- the lack of parity of esteem between vocational and academic qualifications from the perspective of some teachers, parents and advisers which leads some learners to neglect or underplay the viability of the vocational option at the age of 16. Vocational qualifications at level 3 should be seen as an excellent alternative to A levels that can provide a direct route into employment or various forms of higher education
- the view that the excessive degree of assessment in some vocational programmes can make such courses difficult to administer and can prove off-putting to some learners
- the number of vocational qualifications on offer and the range of bodies offering them are considered by many college practitioners to be excessive, with the result that the brand value of vocational qualifications generally is diluted and consistent employer engagement with awarding organisations is hampered. However there is no consensus on which particular qualifications should be removed.

More broadly, the success of vocational education is crucial for the development of Wales' economy in the 21st century. The UK Commission for Employment and Skills' report on the skills needs of the UK predicts "that skilled trades jobs in Wales should rise in Wales, whilst declining elsewhere [in the UK]" while "employment growth [in Wales] should be above the UK average in the primary sector and construction, [and] trade".² This picture for Wales is supported by some significant shifts that may be occurring in the wider global economy in the coming period. *The Economist* recently devoted an issue to what it has called the coming 'third industrial revolution' for manufacturing and innovation. It reported that: "the wheel is almost coming full circle", with some highly skilled manufacturing jobs coming back to western nations from Asia in the coming decade as a result of higher labour costs and higher energy and transportation costs in getting products back to western markets.³

² *Synopsis of UKCES Working Futures Report 2010-2020*, DfES, Welsh Government, 2012.

³ Special Report, 'A third industrial revolution', *The Economist*, 21st April 2012, p.4.

Question A3.5

- i) To what extent are Essential Skills Wales qualifications relevant and valued?*
 - ii) Please give reasons.*
 - iii) To what extent are Wider Key Skills qualifications relevant and valued?*
 - iv) Please give reasons.*
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There are different views within colleges on the extent to which ESW has become valued by learners and employers. It is fair to say that the profile of ESW is not yet fully established in Wales among learners or employers and some practitioners have questioned whether there is sufficient emphasis on numeracy and literacy within the ESW, or whether at a post-16 level ESW needs to be specifically mainstreamed within the academic or vocational qualifications being pursued by the learner. This is a matter that colleges leaders generally feel needs to be addressed in the short to medium term.

Wider Key Skills have generally been seen to have benefitted students in the range of soft skills they have helped to engender, although again, their profile remains low among many learners and employers. In general, they are seen to have added value for learners although some have questioned whether certification of such skills can or should be certified and what value that certification brings.

Question A3.6

- i) Should more emphasis be placed on STEM subjects in the 14–19 phase?*
 - ii) If so, how might the qualifications system contribute to this?*
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STEM is clearly important to the economy. STEM qualifications can be enhanced by:

- better evidence made available for learners on the employment and progression benefits of gaining a level 2, 3 or 4 STEM qualification – i.e. seeing the wage uplift of a STEM qualification may change learners minds about the importance of STEM study.
- the use and encouragement of STEM qualifications such as the BTEC qualifications that make STEM seem accessible and relevant to learners.

Question A3.7

- i) Do you think that the Welsh Government should launch a major communication campaign in relation to qualifications in Wales, once its new policy is established?*
- ii) Do you have suggestions about the messages of the campaign and how to make it effective?*

iii) How could learners be better supported, informed and advised when choosing qualifications at 14 and 16?

If the Welsh Government chooses to introduce the WBQ as an overarching general education qualification at 16 and 18 then there would be a strong case for designing a consortium led publicity campaign - which ColegauCymru would wish to be part of - to ensure that the introduction of the new system was understood properly by learners, parents, teachers and lecturers.

As we have stated above, any major awareness campaign on qualifications should also have identify vocational routes to higher education and sustainable employment. Key messages for such a campaign must clearly include reference to the robustness and credibility of any new system as well as its fitness for purpose.

Impartial careers advice information on the full range of options available to them are clearly crucial for students. The recommendation of the Children and Young People's Committee of the National Assembly for Wales in its report on the 14-19 Learning Measure (released in spring 2012) that a LEA-wide prospectus of courses for learners should be published is useful, and ColegauCymru recommends that this be taken by the Welsh Government and adopted across Wales.

Part B

Question B2.2

i) Do you think that qualifications should be funded and delivered through coherent programmes of learning at 16–19, rather than as individual qualifications?

There is a growing consensus in both Wales and England that funding education providers on the basis of individual qualifications is not the optimum way in which to support post-16 learners. This is acknowledged in the Wolf Report and in the Department for Education's (DfE) response to the Wolf Report later in 2011 which states that DfE will move away from qualifications-based funding system.

ColegauCymru supports moves to shift to programme-based funding and is working with the Welsh Government to ensure that the new funding system is fit for purpose and helps education providers meet the needs of learners. It is important that this programme-based approach applies to all learning programmes (vocational and general education) and across the post-16 educational sector.

Programme based funding would have several advantages which include:

- being learner centred: the creation of portfolios or envelopes of learning (programmes) specifically designed to meet the needs of learners would provide room for work experience and employer placements where appropriate. It could also serve to reduce the current funding incentive whereby education providers must teach a high number of qualifications per learner regardless of the individual learner benefits in order to draw down the expected levels of funding
- being focussed on progression: the central goal of each programme should be specified, with clear progression routes to higher levels of learning or training, or sustainable employment and longer-term careers
- allowing professionals to take a lead: programme funding would deliver greater and more appropriate professional leadership by teachers and lecturers by allowing them to determine the optimum learning pathways for their students.

While there are always unintended consequences and perverse incentives to any system of funding education we believe that a programme based system of funding would have distinct advantages over current and previous funding arrangements in Wales.

ii) Within a coherent programme of learning should there be scope for some elements that are not linked to qualifications or formally assessed units?

This would be a key strength of programme-based learning and funding. Programmes could be built not only the main qualification being studied by a learner but also on important elements beyond qualifications such as work placements, extracurricular activities and broader skills. Provided that these non-qualification activities were part of a properly designed programme with built in progression routes and within an envelope of a prescribed guided contact hours, these learning activities would add real value to the student's experience of school or college.

iii) What have been the benefits to learners at 14–19 of credit-based qualifications?

iv) What are your views on the future role of credit-based qualifications in the 14–19 curriculum?

Credit-based qualifications retain a valid role particularly in relation to part time and lifelong learners who may not wish to follow a full programme of study. Credit-based qualifications offer learners the potential to build a portfolio of bite-sized awards over time and thus securing greater flexibility in attaining qualifications. Despite the benefits, there has not, in many practitioners' eyes, been a large uptake of bite-sized learning, perhaps due to the decline in part-time study.

v) In relation to qualifications, how could schools, colleges and work-based providers collaborate better for the benefit of learners?

Collaboration should be founded on the relative strengths of the different learning providers. The 14-19 Agenda has improved relationships between schools and FE colleges in relation to the provision of vocational courses but at the same time many schools have attempted to offer more vocational courses in-house without recourse to the expertise and resources that can ensure high-quality industry-ready provision.

Where the Transformation of post-16 education has occurred in a local authority area there are much stronger relationships between FE colleges and schools in their collaborative 14-16 offer. This should offer a template for future work on Transformation between providers in the coming period.

Question B3

- i) *Should the number of qualifications approved for public funding at ages 14–19 be reduced?*
 - ii) *If so, which qualifications should no longer be available at 14–16 and/or 16–19?*
-

ColegauCymru is in favour of a reduction in the number of approved qualifications. Having said that, we do consider there to be a distinct benefit in a wide range of approved qualifications (particularly vocational qualifications) being available. We consider that the greatest scope for reducing the overall volume of approved qualifications - other than those already envisaged in the consultation paper itself - is in the additional (or so called 'bolt on') qualifications that are sometimes offered in addition to learners main qualifications.

As noted in response to Q 3.4, there is no consensus on which particular qualifications should be removed.

Question B3.1

What should be the criteria for retaining a qualification in the list approved for public funding?

We consider that the criteria should include evidence that:

- there is a genuine demand for a qualification from education or training providers that cannot be met through other types of provision
- the qualification helps progression to higher levels of learning or employment
- that the qualification meets an employer need or societal priority in terms of an apprenticeship framework or lifelong learning need
- a professional learning community such as a programme validation panel (or equivalent) recommends the use of such a qualification.

Question B3.2

- i) *To what extent should employers play a role in the development of qualifications for 14 to 16-year-olds?*
- ii) *To what extent should employers play a role in the development of qualifications for 16 to 19-year-olds?*
- iii) *Should Sector Skills Councils be the main mechanism for this?*

iv) Please give reasons.

ColegauCymru considers that 14-16 qualifications should focus on the attainment of certain core skills and knowledge, and that they should enable learners to progress to higher levels of learning (i.e. up to level 3 and above) or into work-based/related learning. Such qualifications include skills that are important for employment (independent work, team work, critical thinking skills) these are not skills that are specific to a particular job, trade or profession. Given that, there appears to be less of a case for involving employers directly in the design of these more generic vocational qualifications

The case for employer input into vocational level 3 qualifications is stronger, as there is a more specific vocational content to many of these awards. Here there is a case for the involvement of employers and the Sector Skills Councils, and this done already in some cases. [The role of employers and SSCs in the development of apprenticeship frameworks in Wales is clearly a critical one and is a role that should continue.] The capacity deficits of some Sector Skills Councils (SSCs) in Wales in some cases to respond to the demands put on them in some instances is widely appreciated. This might affect the efficacy of involving some of those SSCs in responding to such an agenda in Wales.

The role and remit of SSCs have recently changed. The UK Commission for Employment and Skills' (UKCES) partnership agreement with the Alliance of SSCs⁴ states that SSCs should focus on improving investment in skills and working to ensure the creation of more and better jobs. UKCES also notes that from 1 April 2012, SSCs have been funded on an 'investment-based, contestable and differentiated approach' as opposed to the previous 'equal shares' methodology. No mention is made of qualifications and it appears that the contribution of SSCs will inevitably differ between sectors.

v) To what extent should universities play a greater role in the development of A levels?

vi) Please give reasons.

ColegauCymru considers that universities should be one key partner constituency in helping to devise the content of A Level qualifications. They should not, as envisaged in a recent statement by the UK Government Education Minister, be the sole or predominant influence. A levels are not used exclusively as a qualification for university entry and should not be treated as such in their design. As noted in response to Q3.4

⁴ Published on UKCES website

above, students may progress from A levels into employment and/or training as well as higher education. Those with general expertise in relation to qualifications should continue to play a key role in consultation with a range of stakeholders including colleges and universities.

Question B4.1

- i) *How should learners' literacy and numeracy skills at 14–16 be assessed?*
 - ii) *Which of the options listed do you prefer? (Please delete as appropriate.)*
 - a) *Commissioning new specifications for GCSE English Language, GCSE Welsh First Language and GCSE Mathematics qualifications for Wales which build directly on the literacy element of the NLNF framework and encourage the development of those skills throughout Key Stage 4 and beyond if needed.*
 - b) *Developing or commissioning new, externally assessed, national literacy and numeracy tests for Key Stage 4 and incorporating these into the core of the Welsh Baccalaureate Qualification at Intermediate level instead of Essential Skills Wales qualifications.*
 - c) *Increasing the level of demand in the assessment of literacy and numeracy skills within Essential Skills Wales, perhaps in externally marked tests.*
 - d) *Commissioning new GCSEs in Literacy and Numeracy to run alongside, or as a precursor to English Language, Welsh First Language and Mathematics GCSEs.*
 - e) *Integrating subject-specific expectations for literacy and numeracy skills into the subject criteria for each of the next generation of GCSEs.*
 - f) *Introducing teacher-assessed literacy and numeracy tests at 16.*
 - iii) *Please give reasons and any further comments.*
-

There is support for either options **b** and/or **e** within the context of a new overarching WBQ qualification. Either or both options within the context of an overarching WBQ qualification might deliver the necessary focus on numeracy and literacy for 14-16 year olds. A clearer policy or steer on how learners who have not achieved at least a C grade in GCSE Maths or English might progress to the next CQFW/NQF level would be welcomed by many within Wales' FE colleges. In addition the importance of recognising literacy levels in the Welsh language in respect to the Welsh First Language GCSEs needs to be emphasised.

Question B4.2

- i) *Should post-16 full-time learners who have not achieved Level 2 in literacy or numeracy be supported to reach this standard?*
 - ii) *Please give reasons and any views on how this might be achieved:*
-

Yes, there is a general view that post-16 learners should be supported to reach level 2 literacy and numeracy. This should be done by building literacy and numeracy skills into learning programmes such as the new WBQ framework qualification and/or GCSEs and into apprenticeship frameworks.

As Maths and English and/or Welsh GCSEs are so critical, students should be encouraged to resit if they achieve a grade D. Some students may need several attempts to get to C or above and should be afforded greater flexibility to sit these GCSE exams up to the age of 18. The value of multiple resits in other subjects is more debatable. The greater integration of applied Maths and English within these qualifications may also be of assistance in this respect.

Question B5.1

- i) *Should the Welsh Baccalaureate be graded at Foundation level in due course?*
 - ii) *Should the Welsh Baccalaureate be graded at Intermediate level in due course?*
-

This issue should be considered in the recommended decennial review of the WBQ. There is currently a mix of views among college managers on the grading question with a tendency to see the demerits of grading at the lower levels - especially at Foundation level. There is, however, general support for full grading at the Advanced level of the WBQ and some level of support for grading at level 2.

Question B5.2

- i) *Should GCSEs continue to be available to learners on a unitised basis?*
 - ii) *What are your views on the amount of 'terminal assessment' that is appropriate (it is currently 40 per cent)?*
-

There is widespread support within colleges for some reduction in, but not an abolition of, unitisation in GCSEs - although it is particularly important to take into account the different learning methodologies employed by different GCSE subject areas rather than agree to a 'one-size-fits-all' change.

In terms of terminal assessment, there is widespread support for an increase in the proportion of such assessment to a level of 50% or more. Changes to specific GCSEs should depend on the subject areas being taught and the learning methods employed in that subject. Some subjects, for example, such as art & design or other practically oriented subjects require products or portfolios for assessment.

Colleges in Wales do not support a move to full linearity in GCSEs.

iii) What are your views on having a more formal two-stage assessment of GCSEs, along similar lines to the current model for AS and A2?

There has not been general support for such a proposal within colleges on the basis that this measure would introduce a significantly higher degree of tiering into GCSEs and may in fact unintentionally create a *de facto* 'two tier' system for GCSEs (resurrecting some of the criticisms of the previous O level system in Wales and England).

The two-stage assessment at AS/A2 level results in a huge number of students leaving at the end of year 12. It is conceivable that a similar approach to GCSEs might result in a similar set of difficulties.

- iv) What are your views on controlled assessment? How could it be improved?*
 - v) Should controlled assessment be retained as a feature in the next generation of GCSEs in Wales?*
 - vi) If yes, should controlled assessment be retained for most GCSEs or only for some?*
-

Controlled assessment is one of the ways in which non-terminal assessment can take place within qualifications and they therefore play an important role in the qualifications system. ColegauCymru recommends that the review team awaits the findings of the forthcoming Ofqual review of controlled assessment before coming to a view on their future in Wales. It may be that strict guidance could be issued that could improve the way in which controlled assessments are carried out.

Question B5.3

i) What are your views on the current tiering of GCSEs?

There is a widespread view within colleges that the current tiering system requires lecturers and teachers to make invidious choices as to which of their students are capable of attaining GCSE grades that are generally considered a good pass by employers and HE providers. While it is clear that not all learners will gain the highest grades in GCSE, many lecturers and teachers feel uncomfortable in having to decide which learners should sit the higher papers and, by so doing, relegate the others from having a chance to attain the higher grades. There is thus widespread support within colleges for dispensing with the current system of GCSE tiering in Wales. However the needs of basic skills learners also need to be taken into account and for these learners a Foundation tier GCSE should be retained, recognising that a C grade GCSE opens many doors.

ii) What are your views on focusing GCSEs on Level 2 attainment and creating a new Level 1 qualification to reward achievement at this level as a stepping stone to subsequent progression?

There is some support for a new stepping stone qualification for those entry level/level 1 learners where there is robust evidence that they are very unlikely to achieve a GCSE pass grade. However an important proviso is that such a qualification is not used as an alternative for more able learners who are capable of attaining GCSEs or as an opportunity for some learning providers to 'warehouse' learners for an extra year.

The decennial review of the WBQ should consider the extent to which the non-Core element of the Foundation WBQ should include GCSEs or other new qualifications in order to optimise progression routes for level 1 learners.

Questions B5.4

i) Should there normally be a maximum number of GCSEs pursued at school?

ii) If yes, what should this maximum number be?

There is a general view that the number of GCSEs studied by some students is excessive. There is a sense that may be diminishing returns once a learner has taken more than a certain number of GCSEs and the cost of providing such learning could be disproportionate. Although very able learners can benefit from, and be stretched by, a wide range of choice of GCSEs, in general, students should be discouraged rather than

encouraged from taking too many GCSEs, with more emphasis being placed on grade achievement rather than total subjects passed (especially in terms of emphasising Maths and English and/or Welsh grades).. Agreeing a figure for a fixed maximum of GCSEs would, however, not be appropriate.

It is quite possible that the introduction of a general education learning programme with a set funding and guided contact hours envelope might encourage providers to limit the number of GCSEs taken by learners. Stronger guidance on this matter from the government or from these learning programme panels would therefore be welcome.

Question B5.5

- i) Assuming the continuation of A levels in Wales, should AS levels be retained as a stepping stone to A levels?*
 - ii) Should A level learners be able to take modules before the end of the course (AS and/or A2)?*
 - iii) Should learners be able to retake A level modules to improve their grade, without having to resit the whole qualification?*
 - iv) If yes, should the best mark or the most recent mark count?*
 - v) Should retakes of modules be limited to one per module?*
-

If A levels continue in Wales there is a general level of support in colleges for the retention of AS levels as a preliminary qualification to the full qualification. However contrasting views are evident in responses from colleges. One view is that many learners may not go onto to complete a two year A-level programme but may benefit from the credit and experience gained from AS levels. This view however is balanced by concerns that some learning settings may enrol some students at the age of 16-17 onto AS levels despite value added data suggesting that these students may have little prospect of gaining good grades at AS level and therefore being able to progress to A2 level. The lack of availability of robust performance data at AS levels by provider also frustrates the ability to effectively evaluate institutional performance.

ColegauCymru has consistently argued that the retention, attainment and successful completion data should be collected on students taking AS and A levels in schools – the same measures as those used in FE colleges (see also Q 6.1).

Generally colleges see merit in restricting modules to the end of the course, that is, to the end of each academic year. These is a widespread view that mid year exams for these qualifications are not necessary, although the end of academic year exams are

important for students to be able to benchmark themselves against national standards and for HE providers to have an indication of the attainment of students for the purpose of university offers.

There is also a widespread view within colleges that resits should be restricted to a single occasion but that the most recent mark should be the one that counts towards the final grade unless there are extenuating circumstances.

Question B5.6

Should Wales adopt the Initial Vocational Education and Training (IVET) and Continuing Vocational Education and Training (CVET) definitions for vocational qualifications?

ColegauCymru supports the adoption of the IVET and CVET European classifications in Wales. There continues to be some confusion as to the distinction between general vocational education carried out before entering working life (IVET) and the more competency based approach taking place after initial education or training or after entry into working life (CVET). However, adoption of the classifications might clarify the purpose and role of a large number of qualifications and assist in a clearer definition of vocational education in Wales. In its evidence to the Review, ColegauCymru drew attention to research showing the lack of understanding of the term 'vocational education' by pupils aged 14-16 and by their parents who were unaware of the wide range of vocational choices available at the age of 16.

Question B5.7

- i) Do you agree with the proposed recommendations for limiting vocational qualifications at 14–16 to 40 per cent of learning time?*
 - ii) Do you agree that at 14–16 vocational qualifications should be broad-based and not attest to occupational competency?*
-

ColegauCymru agrees that a limit of about 40% should be placed on the proportion of time spent by 14-16 learners on vocational qualifications.

As explained in our response to QA3.4, we do not consider that vocational qualifications for 14-16 year olds to attest to an occupational competency.

iii) Do you agree that only IVETs are appropriate at 14–16?

Yes, as a general norm.

As noted in Q5.6 above, an occupational competency based approach is not appropriate to young people aged 14 to 16 who should undertake broad-based vocational qualifications.

iv) What are your views on expanding the use of the GCSE brand across vocational and general subjects?

ColegauCymru does not support the proposal to extend the brand of GCSEs to vocational qualifications. GCSEs have a prime academic focus and it would cause confusion for these to be offered in vocational subjects. The major awarding organisations such as Agored Cymru, City&Guilds and Pearson (Edexcel), have well developed vocational qualifications at various levels and to brand these as GCSEs is not necessary. However, as noted in response to QB5.6, there is a need to continue to improve the understanding of vocational qualifications among young people, teachers and parents.

v) What are your views on strengthening externality in the assessment of all vocational qualifications approved for use at 14–16?

vi) Do you have views on what forms this element of strengthened externality should take?

Externality for vocational qualifications can be strengthened through the better use of moderation and external verification and/or the greater use of such tools as multiple choice questions and/or controlled assessments in some circumstances. Such measures would be welcomed by colleges if they were reasonable and proportionate for the qualification and its component units.

Question B5.8

i) Do you agree that both IVETs and CVETs could be appropriate for 16 to 19-year-olds?

ii) In what circumstances or sectors might CVETs be appropriate?

ColegauCymru agrees that both IVET and CVET qualifications can be appropriate for 16 to 19-year-olds and supports the Review group's intention to properly roll out their use as definitions. As the consultation papers states, CVETs are particularly appropriate for

work based learning qualifications and for qualifications within an apprenticeship framework, or other trade-oriented learning frameworks.

Question B5.9

- i) Do you think there should be a greater external element in the assessment of Essential Skills Wales?*
 - ii) Please give reasons and any views on the kind of external element you think should be used.*
 - iii) Do you think that Essential Skills Wales should be graded?*
 - iv) Please give reasons.*
-

An external element to Essential Skills Wales would be welcomed though this should not include an external exam in the traditional GCSE sense. There is a case for considering a controlled assessment or multiple choice tests within ESW which may add to the perceived robustness of the qualification.

There is not currently a groundswell of support for the grading of ESW within colleges.

Question B5.10

- i) Do you think the Wider Key Skills need a clearer title?*
 - ii) If so what should they be called?*
 - iii) Do you have any views on the content or assessment of the Wider Key Skills or the progression they offer?*
-

There is a general view that a new title of this suite of skills would be desirable but there is not a consensus as to what this revised title should be. Many practitioners are not convinced that offering Wider Key Skills as a 'stand alone' qualification is particularly appropriate or valuable, though the adoption of a programme-based approach to funding post-16 learning may well help integrate Wider Key Skills into a broader envelope of learning which may be more appropriate for the student. Colleges advocate the closer involvement of employers in the content of Wider Key Skills.

Question B5.11

- i) Are entry level qualifications currently meeting the needs of less-able or less-engaged students?*
 - ii) Are any changes needed?*
 - iii) Could any of the proposals in this consultation paper impact adversely the provision of appropriate qualifications for less-able or less-engaged students?*
-

The consultation paper appears to take full account of the needs of less able and less engaged students. ColegauCymru supports the decision of the Review to commission work to determine whether current qualifications meet the needs of entry level learners. A more detailed consideration of the importance of Entry level and Level 1 qualifications will be helpful. Much of the publicity surrounding qualification reform concentrates on potential changes to GCSE and A levels and makes little reference to the needs of less able and less engaged learners.

The fact that around 12% of young people aged 16 and above are not in education, employment or training (NEET) underlines the importance of focusing on the needs of young people who are disengaged at school and likely to become NEET.

Question B5.12

Do you see a role for the delivery and funding of Quality Assured Lifelong Learning (QALL) QALL units within programmes of learning for 16 to 19-year-olds? If yes, what would they add?

College practitioners see a role for QALL units to be integrated into units of learning with a focus on such areas as employability skills, entrepreneurship, teambuilding and self development. Again, a move to programme-based funding of learning may help integrate such units.

Question B5.13

Do you have any suggestions for improving the Welsh-medium qualification offer at 14–19?

The FE sector in Wales has committed to a ColegauCymru-led National Strategy on Bilingualism in FE. In addition, colleges are actively working towards meeting the Welsh Government's targets contained in its Welsh-Medium Strategy for Education which

expect a significant increase in the provision of Welsh-medium and bilingual qualifications.

ColegauCymru supports the key points made in the consultation paper, particularly the importance of ensuring that key qualifications are available through the medium of Welsh and that the Welsh Government is committed to support awarding organisations to develop Welsh medium qualifications.

It can be problematic to find Welsh-speaking moderators and external verifiers. The establishment of a national database may help.

Greater access to learning materials including online learning materials for Welsh-medium qualifications would also assist in helping learning providers offer those Welsh-medium qualifications that are already available. We hope that the forthcoming Hwb will help in this regard.

There also needs to be continued uplifts for Welsh medium qualifications, recognising the added costs of such provision and the need to provide a real incentive to providers and learners.

Question B6.1

- i) Do you agree with the proposal to reaffirm the importance of the Level 2 Inclusive and Average capped points score at Key Stage 4?*
- ii) If not, please explain why.*
- iii) Do you think there should be any changes to the post-16 measures?*
- iv) If yes, please outline what these should be.*
- v) Should we remove any measures, or are there any additional measures we should include?*
- vi) If yes, please outline your suggestions.*

There is a general view from colleges that there should be a cap on the average capped score at level 2 at Key Stage 4.

More broadly on the issues of performance measures, ColegauCymru is keen to see a better alignment between the Plasc and the LLWR, in accordance with the recommendation of the Thomas Review of Education Structures, and accepted by the Minister for Education. With regard to the provision of transparency of data for learners, as well as assisting self-regulation and the raising of standards, we believe that there

should be a greater comparability between the post-16 performance outcomes of schools and colleges in Wales - particularly in relation to learner attainment, progression and retention.

We welcome recent developments that indicate that such an approach is being scoped within government.

Question B6.2

i) *Do you agree with our proposal to introduce a limit of two GCSEs 'equivalence' for vocational qualifications in performance terms?*

ii) *If not, why not?*

This proposal is not supported by colleges; it appears not to have been based on a consistent evidence base. In our view, equivalence should either be based on the level of guided contact hours required to deliver the qualification or on an independently determined assessment of the content and nature of the individual qualification. A general reduction in the equivalence of vocational qualifications vis-à-vis academic qualifications to two GCSEs regardless of the size and depth of a vocational qualification may have negative and unintended ramifications.

The issues regarding vocational qualifications pre-16 and post-16 should be considered separately. Vocational qualifications are likely to represent a relatively small proportion of the overall learning programme pre-16, whereas it is much more likely that many learners will be following full vocational programmes post-16.

iii) *Do you agree with our proposal to continue to count qualifications that are smaller than a GCSE (for example, GCSE short course or vocational qualifications of similar size) in performance measures?*

iv) *If not, why not?*

Yes, there is agreement within colleges that such short courses should continue to count in performance measures in line with the broader approach of credit based learning that has been adopted in recent years.

Question B6.3

- i) Do you agree with our proposal to place a limit of 40 per cent on the contribution of vocational qualifications to the Level 1 and Level 2 performance measures?*
 - ii) If not, what limit (if any) would you suggest, and why?*
 - iii) Do you agree with our proposal to maintain our current approach to discounting for identical or very similar qualifications?*
 - iv) If not, why not?*
-

There is support for both of these proposals though there is a case for a technical consultation with school and college colleagues prior to the implementation of widespread changes to the performance measure framework.

Question B6.4

- i) How important is it to maintain the ability to make direct comparisons of school performance with England?*
-

ColegauCymru believes that it is much more important for there to be broader internationally conducted measures of aggregate learner attainment than cross border measures of school-to-school attainment. The PISA programme would be an example of international assessments of learner progress which should be more useful at a national level than comparing the performance (however it is measured) of an individual school in Wales to another school in England, each with its unique circumstances and social composition.

ColegauCymru recognises that the announcement of new performance measures in England to run from 2014 will make comparisons between England and Wales more difficult. This may be viewed as one of the inevitable results of devolution as the Welsh Government make decisions that are seen as benefitting the citizen of Wales and which from time to time will run counter to those made by the UK Government.

Questions B7.2

To what extent do you think that the current market structure for the provision of qualifications:

- i) is 'fit for purpose'?*
- ii) influences the behaviour of centres in terms of the specific qualifications they choose for their learners?*

- iii) impacts on grades, standards or outcomes?*
 - iv) impacts on the provision of Welsh-medium qualifications?*
 - v) Can you suggest an alternative model which you think might be preferable to the current system?*
 - vi) Please state whether your answers refer to general qualifications, vocational qualifications, or both.*
-

ColegauCymru is generally appreciative of the findings of the Review of the Structure of the Qualification Market in Wales in relation to the efficacy of the current market structure.

The ability or financial viability of a single awarding body to award all of the vocational qualifications at all levels (from Entry to postgraduate and licence to practice qualifications) in Wales is highly questionable. This is for example the case in relation to access to vocational qualifications such as Extended Diplomas - which is a successful element of the post-16 offer from colleges in Wales.

Although there may be more of a case for a stronger role of the WJEC in the provision of general education exams in a new qualifications system, the WJEC has no expertise in the provision of vocational qualifications. The prospect of a single awarding body for all qualifications in Wales is not considered a viable option.

ColegauCymru also supports the importance of Awarding Organisations being strongly encouraged to provide qualifications through the medium of Welsh.

Questions B7.3

- i) Do you have any views on the future of regulation and quality assurance of qualifications for 14 to 19-year-olds in Wales?*
 - ii) Should awarding organisations be allowed to deliver seminars to teachers in Wales?*
 - iii) If so, for what purposes should they be able to deliver seminars?*
 - iv) To what extent could, or should, the security of the present seminar system be improved?*
-

ColegauCymru supports the view of the Review Panel on the Structure of the Qualifications Market in Wales that the rolling review of standards conducted by the Welsh Government and Ofqual of awarding bodies should continue as a key quality

assurance measure. However, it remains to be seen if these 'joint reviews' will be viable following changes to the qualifications system in England in the coming period.

The delivery of seminars by such bodies is something that should be permitted to continue within revised rules. It would be helpful if awarding organisations were encouraged to provide online access to such seminars, for example through streamed webcasts and/or online recordings in order to ensure wider access to their content.