

14-19 Learning Pathways Policy: The Way Ahead

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Introduction

1. ColegauCymru welcomes the opportunity to respond to the Welsh Government's consultation on 14-19 Learning Pathways: The Way Ahead. 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
2. Colleges are the predominant providers of vocational and technical education in Wales, providing about 85% of the total provision. Colleges are also major providers of general education provision in Wales, helping to produce some of the best learner outcomes. Colleges are therefore well placed to be at the heart of 14-19 Learning Pathways developments in Wales and have been some of the most active contributors within each local authority area. Developments such as the Rhyl Sixth and Coleg Sir Gar's collaborative work with schools in Carmarthenshire have been highlighted as good practice by the Welsh Government in its transformation case studies, published in summer 2013. Good practice exists elsewhere in Wales, but the picture is too patchy to consider the 14-19 agenda a success thus far.
3. ColegauCymru generally welcomed the development of the 14-19 agenda in previous Assembly terms and positively contributed to the shaping of the Learning and Skills (Wales) Measure (2009), which we believed would improve choice for young people and, importantly, raise the profile of vocational pathways. However, colleges still have concerns about the way in which the agenda has been taken forward in many parts of Wales.
4. Certain structural issues relating to the funding of education and the ways that performance measures differ between types of providers are yet to be fully addressed. For example, 'successful completion' 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 Minister's recent announcement that the Welsh government is proposing to develop and implement a consistent set of performance measures for the post-16 sector.⁴ There would be comparable information on both schools sixth forms and further education colleges to enable learners to be able to consider their options more fully as they complete their pre-16 education.

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).

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

5. Without changes in these areas, and the wider provision of impartial and independent careers advice, learners will continue to lack information and an appropriate context for the choices they make at the end of Key Stages 3 and 4. These are matters that we hope the Welsh Government will take forward as a priority in its reshaping of 14-19 policy in 2014.
6. The overall experience of learners of the 14-19 Learning Pathways has varied considerably from local authority to local authority, and in some respects from school to school. Some authorities and schools have taken a constructive approach to this key agenda and worked closely with colleges and other providers to ensure that learners have a wide range of choices, including vocational provision.
7. In other areas, schools have sought to organise vocational provision in-house or with nearby schools, forgoing the expertise, experience and facilities within colleges. Some schools have tried to patch together an incoherent programme of study based on resits, vocational units and other small qualifications. This has too often not been in the interest of learners and has consequently diminished their educational experience at a crucial stage of their learning pathway.
8. New Welsh Government developments emanating from the independent Review of Qualifications in Wales, however, do give colleges hope that some of the less positive aspects of the implementation of the 14-19 agenda can be addressed, at least in part (see our response to Question 8).
9. We are happy for our response to be placed in the public domain and would warmly welcome any further input into the policy development process in this area that may take place in 2014 or beyond.

Q1.

Would bringing forward new Regulations early in 2014 reducing the number of courses that must be included in the local curriculum from 30 to 25 with effect from September 2014 cause your organisation/school particular operational difficulties?

Q.2.

Would bringing forward new Regulations early in 2014 reducing the number of vocational courses that must be included in the local curriculum from five to three with effect from September 2014 cause your school/organisation any operational difficulties or prevent you from providing the most appropriate balance of choice for your learners?

10. The key issue here is that learners, wherever they live, are given a structured and informed choice of high quality courses across a range of subject areas in general and vocational education. Each learner should then be enabled to tailor a learning pathway based on independent and reliable career and progression advice. The configuration of learning provision should, as far as is reasonable

and practical, address the informed choices that learner make in this context, rather than the convenience of the provider(s).

11. The availability of a breadth of courses for learners aged 14-19 is essential. **The proposal in Q2 to reduce the number of vocational courses available to learners is therefore a retrograde one that ColegauCymru cannot support.** We consider that a choice of a minimum of five vocational courses to be about right for 14-19 learners.
12. Five is not an excessive number in seeking to ensure that learners, many of whom will go on to a mainly vocational learning pathway, have an appropriate choice of relevant and appropriate courses. Three is not sufficient. Colleges are still reporting that they are enrolling students at the ages of 17 and sometimes 18 who have not been given the opportunity at school to choose from a sufficiently broad range of courses including vocational subjects. These young people have in effect wasted one or two years taking unsuitable courses at a cost to them personally and to the Welsh taxpayer.
13. The proposal to reduce the overall number of courses from 30 to 25 (as proposed in question 1) should be seen in this context. If the overall reduction is bought at the price of a reduction in the number of vocational courses offered, then this proposal would not supported by ColegauCymru.
14. ColegauCymru considers that the minimum number of vocational courses offered should be maintained at five.

Q3.

Would bringing forward new Regulations and changes to statutory guidance early in 2014, removing the requirement on schools and colleges at Key Stage 4 and post-16 to meet respective points scores when compiling the course offer for September 2014, cause your organisation/school/college any operational difficulties?

15. ColegauCymru does not consider that removing the requirement for 'points scores' for schools and colleges should create particular operational difficulties - if this is well planned and communicated to all providers. ColegauCymru would have concerns, however, if the abandonment of points scores were to go hand-in-hand with the proposed reduction in the minimum number of vocational courses that must be included in the local curriculum (see our response to Q2 above). The answer to this question relates to the answers to Q1 and Q2 above.

Q4.

We propose to amend programme guidance to facilitate use of the Pupil Deprivation Grant and School Effectiveness Grant from 1 April 2014 to enable schools to use those resources more flexibly in meeting their learner support needs, particularly around the learning coach function (including staff training costs). Would bringing about such an early change cause your school/institution any operational difficulties? Are there any potential consequences you wish to draw to our attention?

16. It appears that some smaller school sixth forms, which are educationally sub-optimal because of their low number of learners and breadth of their curriculum offer,^{5,6} continue to be viable only because the grant given by the Welsh Government for pre-16 provision is used to subsidise the sixth form. Under these circumstances, 11-16 learners are, in effect, subsidising 16-18 learners. The increased flexibilities in the use of the PDG or the SEG for schools for 14-19 provision should not be used to further cross-subsidise school sixth form study where that provision was not genuinely sustainable on a full economic cost basis. ColegauCymru would therefore oppose the use of SEG and PDG for this purpose and cannot lend its support to this proposal at this stage for that reason.

Q5.

We propose to bring about greater strategic and integrated planning within consortia around school improvement and 14–19 delivery. Do you see value in enhancing that role at the regional level? What issues would you like to see reflected in planning arrangements as they are developed over the coming months?

17. Regional working in education is key for the 14-19 agenda as well as in other areas. Colleges have been through a process of transformation in which the number of FE colleges and institutions has reduced very significantly. We now have a significant number of 'regional' colleges that span more than one local authority area. Integrated planning across an area greater than a local authority should be a clear desirable *where it makes sense for the learner*. Regional working in relation to transportation for learners is certainly one area that could be productively explored.

18. In brief, whichever administrative structures are explored and adopted, the needs and informed decisions of the learners should remain paramount. Learner pathways should, wherever possible, be at the centre of the funding and administrative arrangements of providers, local authorities and the government.

⁵ *Effective Sixth Forms*, Office for Standards in Education (1996) London: HMSO.

⁶ *Wider choice and the learning core: progress in implementing a wider option choice and the learning core for 14-19 learners*, Estyn (August 2010).

Q6.

The evolution of 14–19 grant funding to local authorities into a more harmonised funding arrangement to local consortia following the transitional year will likely involve moving from a funding allocation approach, to a more needs-driven allocation process, within overall budget limits. Do you agree with the development of a more needs-based, targeted approach to funding for schools/colleges? What issues/concerns would you like to see addressed in the planning guidance as it is developed over the coming months?

19. ColegauCymru would in principle concur with the case for a needs-based funding allocation formula - but we reserve judgement until the proposed criteria is published. Some of the 'needs' driving the formula allocations should certainly reflect costs to providers accurately, such as transportation. This may be done to some extent at a regional level (see answer to previous question).
20. The second area that requires consideration is the extent to which funding might reflect 'like for like' success rates or completion rate across types of providers. This would provide accountability for the resources allocated to schools and colleges by the government. Currently a 'like for like' comparison is difficult because the databases used by the Welsh Government for schools and colleges collect different data at different points of the learner journey. Success rates for schools and colleges are measured differently. We welcome the decision of the Welsh Government to develop and implement a consistent set of performance measures for the post-16 sector (see para 4, above). Without comparable data, learners and their advisers cannot accurately compare learning outcomes across different types of provider, which in turn undermines the accountability for resources expended.

Q7. Within local collaborative provision, are you aware of any effective examples of alternatives to learner travel currently in operation? Can you provide outline details, including whether there is a cost and/or learner benefit gained from this approach?

21. Strategic collaboration is essential in this area, and as mentioned above, a regional dimension may be appropriate. Sustainable models for learner travel are important in ensuring that learners get the best deal and do not spend excessive amounts of time travelling. Full day release models may have some potential and these have been tried and tested by some providers. Bussing repeatedly within the learning day is clearly a sub-optimal arrangement.
22. The other model that may work for learners is one in which the teachers from schools move with the learners to a learning hub in which both general education and vocational education provision is delivered by more than one provider. One teacher travelling is clearly more efficient than an entire class of students. One innovative example of this model has been taken forward by Coleg y Cymoedd in alliance with Cardinal Newman School and St David's Catholic College, where

post-16 A level learners from Cardinal Newman come to the college's Nantgarw campus to be taught alongside the college's A level students by teachers from all three institutions. This has significantly benefited learners, from both the school and the college, has led to a wider offer (26 subjects) at one location.

Q8. Given the need for continued emphasis on the provision of appropriate vocational course options at Key Stage 4, with a view to learner progression on vocational learning post-16, do you see potential value in the development of more broad-based vocational qualifications? How do you feel such developments would benefit Key Stage 4 learners? How do you consider they would best be developed?

23. ColegauCymru is conscious of the need to structure progression appropriately at different ages and learning contexts. Progression from Key Stage 4 to post-16 should take into account the key findings of two reports of direct relevance, the report of the independent Review of Qualifications for 14-to-19 year olds in Wales and the Wolf Review of Vocational Education in England.⁷ Both emphasised that pre-16 vocational education should not focus on vocational competence or be designed to lead directly into team leader or licence-to-practice roles, but rather, they should provide an introduction to a particular vocational area, that may then be pursued at a higher level post-16 where appropriate.
24. In this vein, we anticipate that the Welsh Government's implementation of the Review of Qualifications will distinguish between qualifications that relate to Initial Vocational Education and Training (IVET) and those pertaining to Continuing Vocational Education and Training (CVET). This distinction is commonly used across continental Europe. This should help develop the breath of education to which the question directly refers. ColegauCymru would support moves in this direction, as we have stated in the past in our input to the Review of Qualifications.
25. More generally we wish to stress the importance of the acquisition of *practical* vocational skills in vocational education, particularly post-16, and not just the theoretical aspects of vocational or technical job roles. Colleges in Wales are particularly adept at delivering these practical skills, which can be essential for a career in particular technical or vocational roles. Tutors, lecturers and assessors in colleges are often employed directly from the relevant industry. Students who leave a learning provider with a certificate in their hand but without 'hands on' skills will find it difficult to gain employment in an increasingly competitive job market. The revised Welsh Baccalaureate Qualification, coming into effect in 2015 for post-16 vocational learners, should help ensure that learners have a rounded set of essential skills which will enhance their employability skills.

⁷ *The Review of Qualifications for 14-to-19 year olds in Wales*, Welsh Government (Nov 2012).
The Review of Vocational Education – The Wolf Report, Department for Education [England] (March 2011).

Q9.

Recognising the various policy developments taking place around the education of 14 to 19-year-olds in Wales, do you consider there is a need for changes in the communications approach of the Welsh Government? How do you think we can best achieve a more joined-up approach to our messages?

26. Good communication of the full curriculum offer in an area is important in helping learners make the right choices for their life and career. Equally important in this context, as noted above, is impartial and effective careers and progression advice from those without a vested interest. Communications should therefore be clearly dovetailed with impartial careers advice.
27. Online publicity and communications is particularly important in reaching young people and must form a key part of the communications toolbox. However, the provision of online communication does not remove the need for face-to-face careers advice.

Q10.

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.

28. Please see the 'Introduction' to this consultation response.