



'Our qualifications - our future'

Response to consultation on proposals to
establish a new qualifications body for
Wales

20th December 2013



WLGA • CLILC

INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and the three fire and rescue authorities.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The WLGA is guided by a number of key principles which underpin the work of the Association and inform responses to key policies and consultations. The WLGA believes that decisions about services should be taken as close point of delivery as possible and that the people and communities using those services should be as engaged as possible in their delivery. It is also our belief that local services should be provided within a democratic framework of local accountability.
4. The WLGA recognises that it is the role of the Welsh Government to set the strategic framework and policy direction for services at a national level and that it is the role of local government to deliver those services taking account of the local circumstances and pressures. It is also recognised that services must be provided within a proportionate but effective regulatory framework to ensure that public resources are used appropriately and that services are delivered effectively and efficiently.
5. The WLGA has consistently argued for an un-hypothecated revenue support grant (RSG) as the best way of funding local government and any new responsibilities or additional burdens placed on local government should be fully costed and appropriately funded.
6. The WLGA recognises that some policy initiatives or strategies need to have funding attached to them for specific periods of time to make sure that they become embedded and are delivered as intended. For this reason, the WLGA, by exception, supports the use of specific grants or the ring fencing of revenue funding for specified purposes on the understanding that funding will eventually return to the RSG.

7. This response is submitted jointly on behalf of the WLGA and the Association of Directors of Education in Wales (ADEW).
8. The principle of simplifying the qualifications system in Wales is understood and is a laudable aim. But any new system must be robust and capable of comparison with qualifications in place across the United Kingdom, and elsewhere, so that Welsh learners are able to compete on an even playing field with those seeking work or further and higher education places outside of Wales: Moreover, that is important in allowing learners from outside of Wales to come into Wales for similar purposes. Because whilst we may wish to have a qualifications system that reflects our national identity and needs, we cannot create an island that does not connect with nations close to home and further afield.
9. The fact is that the movement of labour, learners and skills between Wales and England, and the economic links that thereby exist, are so closely interwoven that any proposed changes on qualifications must recognise that: In a parallel response to the consultation on proposed curriculum and assessment in Wales, these points are equally relevant.
10. The notion that the body created to be responsible for qualifications in Wales should be independent is right and proper; but there are questions to be asked about how the proposed arrangements will ensure that there is (a) transparency in terms of the separation of the various functions that are to be undertaken, and (b) what checks and balances will be put in place to assure stakeholders and others that Welsh learners benefit from a secure and robust system.
11. For example, remit and funding arrangements are intended to rest with Welsh Ministers, and reporting is to the National Assembly. Whilst Welsh Ministers are explicitly losing their regulatory functions and powers, ought consideration to be given to independent regulation by Estyn and/or Wales Audit Office? That would ensure that there is an additional safeguard built into the new system. Even if Qualifications Wales is automatically covered in this regard in its position as a statutory body, it would do no harm to say so, and outline how this would operate: In essence, the clarity that is set out around governance arrangements will be a critical part of ensuring that independence is real, and people can understand and accept that. It is suggested that key stakeholders, particularly local authorities, schools and colleges each have a voice in such arrangements.

12. Following on from the above, it is clear that, terms of a single body having a range of functions which include quality assuring and, at some point, awarding qualifications, there are always dangers unless those roles are separated and the system for doing that is clear and well and widely understood. Models elsewhere, such as in Scotland, demonstrate that this separation is possible. More thought and absolute clarity on these points are needed.
13. It is proposed that Qualifications Wales will be created to become the “..principal authority..” on qualifications in Wales. That implies others have some role. If that is a reference to other bodies inside or outside Wales offering services, such as other awarding bodies, universities or professional bodies, that is understood: If this interpretation is correct, then there is no issue with the scope of qualifications intended to be covered in these proposals. Following a recent announcement by the Minister it is understood that other bodies, if interested in having such a role, would be required to work together in order to do so. This being the case, the WLGA supports this proposal in the overall context of collaborative provision, particularly in the 14-19 phase. Otherwise the term may need clarification.
14. The consultation document makes a number of references to aspects of funding. The WLGA position is clear, and is set out in paragraphs 5 and 6 above.

It is stated in the consultation document (para.3.4) that this proposal offers an opportunity to reduce the regulatory burden and associated bureaucracy. As a matter of principle that is agreed, and the WLGA has always adopted that view. But the recurrent future funding agreements (5.3) between Welsh Government and Qualifications Wales will presumably vary according to annual or other remits from Ministers, and those budget arrangements should not be at a cost to stakeholders. In addition, there is mention (5.5) of income generation by Qualifications Wales offering products and services outside of Wales: Again a principle that is hard to argue against, but that should not be something that becomes a driver for the new arrangements and act as a distraction. The document acknowledges that: But this does introduce another variable into financial planning, and cause some uncertainty for Welsh Government and stakeholders. The WLGA trusts that this would be the subject of future discussion and consultation by Qualifications Wales.

15. The WLGA regards itself as one of the key stakeholders in relation to these proposals and future arrangements and welcomes this opportunity to comment constructively, and looks forward to being engaged in further discussions as matters progress.

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Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: Lesley Davies

Organisation (if applicable): Pearson

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Your address: 190, High Holborn, London, N4 2HW

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
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or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

Pearson does not believe that there are any significant further barriers to the effectiveness of the current system beyond those identified in the consultation document.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

We believe that competition, when aligned with effective regulation, is the best means of delivering efficient outcomes. In a world where skills are static or the learning content does not change the main benefit of competition will probably be efficient delivery and innovation. However, in a world of rapid change and constant uncertainty we believe that it is essential to have a vibrant qualifications sector able to react to those changes. Competition can also drive optimal outcomes, in terms of qualification design and implementation.

By contrast a system that is reliant on a single supplier of qualifications is likely to become less responsive to the market and less efficient in delivery. It will also be a single point of failure in the system which can often make quick remedial action more difficult to accomplish.

There is a real danger that Welsh learners will, over time, be disadvantaged in the workplace if their education and training through qualifications is not kept at parity with developments in other parts of the UK

Pearson shares with the Welsh Government the frustration of qualification policy decisions being made in England that have an unnecessary impact on learners in Wales. Any changes that allow for Welsh learners to have a stable qualifications system are to be supported. One aspect that must be considered in the education of these learners is the need for them to have qualifications that are portable across borders, both within the UK and beyond. The most common destination for learners to leave (and enter Wales) is England (<http://wales.gov.uk/docs/statistics/2013/130312-migration-statistics-2011-en.pdf>). With this in mind, it is vital that learners have qualifications that will be understood and valued by all receiving institutions and other stakeholders in Wales and England.

Pearson greatly values the excellent working relationship it has with the Welsh Government on matters of qualification and education policy and looks forward to this continuing.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Pearson fully supports the establishment of an organisation that acts as an independent regulator and qualification provider that will work across the sector to ensure learners have access to the best qualifications available. Pearson is fully committed to its own continuous improvement and working with stakeholders in Wales to ensure its qualifications are fit for purpose for use in Wales, the UK and beyond.

We would encourage Qualifications Wales to work as collaboratively as possible across the United Kingdom and internationally with other regulators and awarding organisations. Pearson would like to see a regulator that stands up and supports awarding organisations when needed to provide reassurance to learners and other stakeholders on the quality of awarded qualifications.

It should be acknowledged that the new independent regulator will not have substantial experience of accrediting and quality assuring high-stakes qualifications. In this sense, we would encourage Qualifications Wales to collaborate with awarding organisations on the information it will need to fulfil its statutory functions, particularly regarding the accreditation and gate-keeping of qualifications. This is to minimise unnecessary bureaucracy and inefficiencies whilst ensuring the regulator protects the interest of learners in Wales.

The consultation suggests that there will be instances where Qualifications Wales may seek to provide qualifications in competition with Pearson and other awarding organisations. Where this occurs, a transparent qualification development and accreditation process, with published criteria that apply equally to all AOs, including Qualifications Wales, will be vital to the credibility of this process.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Pearson is keen to work with Qualifications Wales to achieve its vision for learners in Wales. In this capacity we already work, and will continue to do so, work with a range of stakeholders across Wales in the delivery of our qualifications.

Currently, we believe there is a need for further information on paragraph 5.9 in the consultation document regarding the future qualification provision of Qualifications Wales and other awarding organisations. This is to allow us, centres and learners to be confident in the provision that can be offered in the short, medium and long-term. Awarding organisations are already developing qualifications for September 2015 and 2016 and, to ensure we meet the needs of Qualifications Wales, we need a concrete understanding of what provision we will be able to offer.

It would be helpful to have more information on the quality assurance requirements and their possible criteria that are detailed in 5.1 - 5.13. It is currently unclear when these will be applied and how the benefit of the quality assurance will be measured. Pearson welcomes the scrutiny and reassurance

that regulatory approval brings and would be happy to work with Qualifications Wales on how monitoring and other activities can satisfy these proposals.

The proposal in paragraph 5.12 states that qualifications will not be funded solely because they are quality assured by Qualifications Wales; instead funding decisions will be taken by the Welsh Government. Whilst Pearson supports this proposal, it does raise a question as to the future role of DAQW as a database of qualifications in Wales. Currently, DAQW is in the process of becoming a database of qualifications where awarding organisations have *applied* for funding. As part of developing the proposal in 5.12 further, we would welcome clarification on how future databases of either quality assured, accredited or funded qualifications will function.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

Pearson has no objections to the governance arrangements in their current detail. We welcome the proposal to work in partnership with Qualifications Wales in the provision of qualifications where it can be done in the best interests of learners in Wales. In any possible collaboration it will be vital that qualifications can still be offered to the necessary standard and service that centres can currently expect from awarding organisations. Pearson would be happy to work further with Welsh Government and Qualifications Wales on the proposals as set out in 5.37.

However, further information is required on how the new regulator will be able to effectively make independent and objective decisions when accrediting Qualifications Wales qualifications and those offered by other awarding organisations. This will require transparency to maintain the confidence of those developing and delivering qualifications for learners in Wales. As part of this, it will be vital that qualifications awarded by Qualifications Wales are held to account in the same way as those by other awarding organisations, as detailed in proposal 5.23.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

Pearson fully supports the proposed scope for Qualifications Wales that is set out in paragraph 5.20. This states that the new regulator will ‘set high level design principles for qualifications that allow awarding bodies to deliver in Wales those qualifications that they also offer elsewhere such as in England and Northern Ireland’.

This aspect of qualification provision is vital to learners in Wales who will, in many cases, be using their qualifications to progress to opportunities outside of Wales. Likewise, it enables learners from outside Wales to progress in education and employment within Wales.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

Public confidence is a vital component for any educational jurisdiction.

We would encourage Qualifications Wales to use the expertise of organisations such as Pearson to provide support in strengthening public confidence in qualifications awarded to Welsh learners. This will allow the new regulator to broaden the expertise within its regulated portfolio and bring best practice from around the world into the learning environments of Wales.

Pearson has recently announced details of its World Class Qualifications project (<http://uk.pearson.com/world-class-qualifications.html>). This project aims to ensure that Pearson qualifications uphold an internationally benchmarked standard and are demanding, rigorous, inclusive and empowering.

As part of its work on World Class Qualifications, Pearson has developed a suite of Level 1 / 2 vocational IVET qualifications that are now available in Wales. These BTEC Level 2 next generation qualifications are the successors to Pearson's existing BTEC Level 2 QCF provision.

More information on these qualifications is available at <http://www.edexcel.com/quals/firsts2012/Pages/default.aspx>. We have worked closely with teachers, learners and a range of other stakeholders to develop these qualifications and ensure they represent the very best progression opportunities for level 2 learners, and a platform from which to build the skills required by employers and Higher Education providers in global markets. The majority of these qualifications will be fully available in Welsh and English.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

Clearly the proposals contained within the consultation, and the 14-19 Review of Qualifications, will have a significant impact on the experience of all learners in Wales, particularly those that are 14-19 years old. As the provider of qualifications to many tens of thousands of these learners, Pearson is aware and prepared for the changes that are likely to occur as a result of this consultation. Our primary concern is to our learners and to ensure that their learning experience is not interrupted or impeded by organisational change outside of their control. We are fully committed to working with the Welsh Government in meeting its vision and ensuring that learners in Wales continue to have access to the highest possible quality of qualifications in their education.

Question 9 – 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.

We do not have any further questions at this point and would only reiterate our desire to work with the Welsh Government and the future Qualifications Wales whenever possible.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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‘Our qualifications – our future’

AQA submission to Welsh Government consultation

20 December 2013

Summary

AQA welcomes the opportunity to contribute to the Welsh Government consultation on reform to the qualifications system in Wales.

Whilst we are supportive of the intentions underlying the proposals in the consultation, we are concerned that there is a substantial body of research evidence and technical expertise which has not fully been taken into account in setting out these proposals. Taking such evidence into account will ensure that decision-making is based on the most robust foundations and system-level risk is mitigated.

We have two major concerns. The first is that there are claims made within the consultation document about the impact of competing awarding bodies – particularly in terms of comparability of standards – which are not evidence-based and are not supported by the research evidence. We address this specifically in our response to “The case for change” below.

The second is not addressed in the consultation itself, but is the point that having a single “awarding body” or equivalent organisation brings substantial risk into the system. This risk is apparent both through the time of change, when the single organisation is being established and on an ongoing basis. We urge the Welsh Government to take full account of the experiences of Scotland (2000), New Zealand (2004) and England during the National Curriculum Test crisis (2008), where the existence of a single organisation responsible for the development/delivery of assessments ran into major difficulties. If there are strong policy-related reasons why the Welsh Government wishes for there to be a single organisation responsible for qualifications in Wales, then we urge them to consider very carefully what arrangements should be put in place to mitigate risk for that organisation and for themselves.

The case for change

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

AQA does not believe that a sufficiently robust case has been made to support the magnitude of changes proposed in this document.

We agree that the current system of competing awarding bodies does not mirror that found in many other countries, but we believe that a robust case can be made for the approach. We set this out in our responses to the Commons Education Committee inquiry into the administration of examinations for 15-19 year olds in England.¹ In our responses, we set out the research evidence

¹ (a) AQA Centre for Education Research and Policy (2011), Response to the Education Select Committee Inquiry into the Administration of Examinations for 15-19 Year Olds in England.

which underpinned our response and demonstrated that there were substantial risks inherent in the models proposed. It is our view that the same risks are inherent in the Welsh Government's proposals.

We begin, however, by considering the research evidence relating to the case for change. One of the key issues is the claim that "Having a market structure results in differences between similar qualifications offered by different awarding bodies. As a result, there are challenges in ensuring parity, such as the standard of work that a learner has to demonstrate to achieve a particular grade in different versions of the qualification" (para 3.3).

In the response to the Commons Education Committee from AQA's Centre for Education Research and Policy (CERP), we addressed precisely this issue, as did other contributions from assessment experts.² The research evidence does not support the view that increasing grade outcomes were due to the existence of multiple awarding bodies, nor to competition between them. Cresswell (1995) demonstrated from a theoretical stance that it was not in the individual or collective interests of awarding bodies to compete on standards.³ This finding was supported by Malacova and Bell (2006)⁴ and is supported by the outcomes of the now-routine statistical analyses. Awarding bodies have sophisticated approaches to setting, evaluating and monitoring inter-year and inter-awarding body standards and this is overseen in England by Ofqual, the independent regulator.

A number of claims are made about the benefits of a single awarding body:

"Allowing one body to deliver the only qualification in each subject area at each level will guarantee consistency across all centres in Wales. Stakeholders will be able to make direct comparisons between regions, schools, colleges and candidates without having to take account of varying course content or to rely on complex statistical data. A single qualification in each subject area and the removal of competition for qualifications such as GCSEs and A-levels will remove any possibility that awarding bodies or qualifications are chosen, because they are the 'easiest'." (para 3.4)

Two slightly different strands of argument can be distinguished here. The first is that having a single awarding body will make it simpler to compare regions, schools, colleges and candidates. *Prima facie*, this is a plausible argument, because a single metric for comparison would be used. The second is that competition between awarding bodies has led to some specifications becoming easier than others and chosen by centres for that reason.

Taking the argument about a single awarding body making comparisons easier first, evidence from the way in which the outcomes from National Curriculum assessments are used in England suggests that this is not as straightforward as it might seem. Whilst the existence of a single metric has its attractions, in practice, there are issues around making direct comparisons. For example, we know that the outcomes of examinations are subject to a cohort effect, with the nature of the cohort and not just the quality of the school having a significant effect on the school's

(b) AQA (2011), Evidence to the Education Select Committee Inquiry into the Administration of Examinations for 15-19 Year Olds in England.

² For example, Baird, J., Elwood, J. and Isaacs, T. (2012), Written evidence submitted to the Education Select Committee Inquiry into the administration of examinations for 15-19 year olds in England.

³ Cresswell, M. J. (1995), *On Competition between Examining Boards*, AEB Internal Report

⁴ Malacova, E & Bell, J (2006), *Changing boards: investigating the effects of centres changing their specifications for English GCSE*, The Curriculum Journal, 17(1), 27–35.

performance.⁵ The existence of a single awarding body would not, therefore, ensure that direct comparisons could more easily be made between schools, as results need to be contextualised.

No evidence is given for the second argument, that competition between awarding bodies “has led to some specifications becoming easier than others” and we are not aware of any such evidence. This is a claim about standards and we were disappointed to note that the research evidence about the standards of both GCSEs and A-levels – including that carried out by the WJEC – has not been referenced.

In England, the strengthened regulatory regime, combined with the existence of increasingly detailed subject criteria for GCSE and A-level, a strengthened role for higher education in the determination of A-level subject content and the existence of robust accreditation processes by Ofqual, provide reassurance that content standards across specifications are both appropriate and comparable.

The use of sophisticated statistical techniques in the setting of standards is routine in GCSE and A-level awarding. This ensures that standards over time are maintained and grade inflation is minimised.⁶ Ofqual recently commissioned an independent evaluation of this approach and the positive report is available on the Ofqual website.⁷ Similar statistical techniques can be used to conduct routine post hoc checks on comparability.

It is important to note that there are additional checks in place. Awarding judgements are made by highly experienced examiners who use their professional judgement to determine the standard. If their professional judgement differs from the statistical evidence, then senior members of staff from the relevant awarding body are involved in a detailed interrogation of all the relevant evidence.

Awarding bodies undertake their own research, carrying out cross-moderation and comparability exercises on any subject which gives a cause for concern.⁸ An annually-collected archive of material provides evidence for such work and is used by both awarding bodies and Ofqual in its five-yearly reviews of standards.

So, whilst we agree that the current system is complex, it is the complexity of the system, with its many checks, balances and safeguards, which provides reassurance that appropriate standards are being set, maintained and monitored. The expertise to do this challenging and demanding work lies in the awarding bodies. Their research staff are technical experts, who work collaboratively to ensure that appropriate standards are set, maintained and monitored.⁹

⁵ See AQA (2013), Response to the Department for Education consultation on secondary school accountability (available at <http://www.aqa.org.uk/news-and-policy/policy/consultation-responses/aqas-views-on-school-accountability>) and Wiliam, D. (2010), “Standardized Testing and School Accountability”, *Educational Psychologist*, 45(2), 107–122.

⁶ Stacey, G (2011). *Standard bearing: a new look at standards*. Paper presented at the Ofqual A New Look At Standards event, London, UK.

⁷ Benton, T & Lin, Y (2011). *Investigating the relationship between A-level results and prior attainment at GCSE*. Report

produced for Ofqual. (available at: <http://www2.ofqual.gov.uk/news-and-announcements/130/745>)

⁸ Since 1973, AQA’s CERP and its predecessor bodies, have undertaken 110 comparability studies of various types. Other awarding bodies also carry out such studies, which are published and available for scrutiny.

⁹ Awarding body research staff sit on the Joint Council for Qualifications (JCQ) Standards and Technical Advisory Group and on Ofqual’s Standards and Technical Issues Group.

The considerations about “Conflicting priorities” and “Cultural and economic needs in Wales” are, however, of a different kind. If Welsh stakeholders do not support the direction of travel of qualifications reform in England, then there might be merit in qualifications being available in Wales which align with their aspirations. A full evidence-based needs analysis would provide a sound basis for the creation of bespoke qualifications for Wales. AQA would, however, be concerned that the emerging decisions about the nature of Welsh GCSEs and A-levels were being taken in precisely the manner counselled against by Huw Evans’ Review: that is, in reaction to decisions being made by the English Government rather than in an evidence-based way.¹⁰

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

AQA believes that it is in the best interests of students and the Welsh Government’s policy objectives to allow multiple awarding bodies to continue to offer GCSEs and A-levels in Wales, under a robust regulatory regime. We are concerned that restricting provision to a single awarding body will have the undesired effect of limiting choice for students, rather than extending it. We consider this risk in more detail in our response to question 6.

Our vision

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

We address each of the elements of the proposed vision for Qualifications Wales in turn.

Simplifying and professionalising the qualifications system

AQA is strongly supportive of the existence of a professionalised qualifications system and the awarding bodies have been at the forefront of driving this work.

The locus of assessment expertise in Wales (and England and Northern Ireland) lies largely within the awarding bodies, with AQA’s Centre for Education Research and Policy being the largest operational research team in the three countries. We have nationally and internationally recognised expertise in assessment.

Although other organisations have played a role in raising the profile of examiners as professionals, it is awarding bodies, such as AQA and WJEC, who have led on the assessment-related professional development for their examiners.

With the abolition of the Qualifications and Curriculum Development Agency, it is awarding bodies who are taking the lead on curriculum development-related issues, working with subject associations and higher education.

There is significant risk inherent in the idea that qualification design, development, awarding, support and quality assurance should be undertaken by a single body. Whilst it is correct that having multiple awarding bodies is not a common model, that does not mean that it is an

¹⁰ Evans, H. (2012), *Review of Qualifications for 14 to 19-year-olds in Wales: Final report and recommendations*. “The national qualifications system for Wales should be developed in a strategic and evidence-based way on the basis of the needs and educational and economic context of Wales. It should not be allowed to simply emerge through a series of reactions to events or decisions in England.” (para 1.2)

inappropriate one for Wales. Where it exists, it works well and has the major strength of mitigating system risk.

Scrutinising, evaluating and improving qualifications within that system

A robust, well-informed regulator is essential to ensure that only high-quality qualifications can be used within a system. For that reason, AQA is strongly supportive of the existence of an independent regulator. In England, that regulator is Ofqual and we agree that there is a need for an independent regulator for the Welsh system.

Supporting and engaging with stakeholders

AQA agrees that broad, deep and ongoing stakeholder engagement is important. We are, however, not aware of any evidence which demonstrates that a single organisation is better able to engage with stakeholders than multiple organisations. The experience of stakeholder engagement for awarding bodies in England – and in particular the requirement for additional engagement with higher education for A-level reform – suggests that, with appropriate mechanisms in place, it is possible for multiple awarding bodies to engage successfully. It is important to remember that stakeholders have a range of perspectives and a range of awarding bodies can ensure that, as appropriate, account is taken of that range.

Awarding bodies also have substantial experience of supporting stakeholders – and, in particular, schools and colleges. The focus of awarding body competition lies in the provision of high-quality support. We are not aware of any evidence which indicates that a single body would do this any better and are concerned that, without the commercial drivers that multiple awarding bodies bring into the system, the quality of customer support might suffer.

Strengthening public confidence in, and information about, qualifications in Wales

AQA agrees that robust regulation could strengthen public confidence in qualifications in Wales. We do not believe that the public would have confidence in an organisation which was responsible for both developing/awarding qualifications and regulating those qualifications. A clear separation between regulated and regulator is essential. We consider this problem further in our response to question 6.

We are strongly supportive of ensuring that information about qualifications is made available to stakeholders, including the public, and agree that an independent body with regulatory responsibility for qualifications in Wales could make a useful contribution to this. This is an area in which AQA has taken a lead, carrying out and publishing research on public perceptions of issues relating to assessment.¹¹

Supplying high-quality qualifications to learners in Wales

AQA does not believe that it is in the best interests of students, teachers or the Welsh Government's policy objectives for qualification design, development and awarding to be undertaken by a single body. We believe that experience to date demonstrates that this is not necessary to ensure the provision of qualifications through the medium of Welsh.

¹¹ For example, Chamberlain, S. (2010). *Public perceptions of reliability*, Report for Ofqual by AQA Centre for Education Research and Policy, and Chamberlain, S. (2013), "Communication strategies for enhancing qualification users' understanding of educational assessment: recommendations from other public interest fields", *Oxford Review of Education*, iFirst, 30 January 2013.

While we agree that moving towards a single body responsible for delivering the majority of qualifications offered to 14-to-16 year olds, as well as A-levels and the Welsh Bac, would simplify the system, we do not agree that it would strengthen the system. We anticipate that much of the simplification could result from a reduction in the breadth of available provision, which would be to the detriment of students and teachers.

We are not convinced that the suggestion that “In a country the size of Wales, there is no clear justification for young people to take significantly different versions of the same qualification in any one examination series” (para 4.11). We do not believe that the size of the country is the pertinent issue, but, rather, that there is considerable merit in ensuring that teachers can retain their current ability to make a choice, based on their professional judgement, about the most appropriate qualification for their own students and to take their custom elsewhere when they are unhappy with the quality of the service received (for example, instances of dissatisfaction with the quality of marking). To remove choice from teachers without a very strong rationale for so doing does not appear, to us, to be appropriate.

How we will achieve the vision

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

We have outlined and explained our concerns above.

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

Insofar as the governance arrangements for the regulatory activities of Qualifications Wales mirror those for Ofqual, the independent regulator in England, AQA is content that they are robust.

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

We address each of the proposed functions of Qualifications Wales in turn.

Quality assurance

AQA supports the principle that regulation should be independent from government and welcomes the proposal for Qualifications Wales to assume independent regulatory oversight of most qualifications in Wales. We agree with the proposed aims and powers of the quality assurance function and the proposed criteria for determining when regulation is appropriate. We are strongly of the view that, in carrying out this remit, Qualifications Wales should work closely with Ofqual and CCEA.

We urge caution around the proposal that the focus of quality assurance should be on the qualifications themselves, rather than on awarding bodies. Our concern is that this could become unmanageable. Rather, we propose a more nuanced approach.

There should be robust quality assurance of awarding bodies, which focuses on awarding bodies demonstrating the fitness for purpose of their policies and procedures. This requirement is in place in England and provides a first line of reassurance to Ofqual about the quality of the assessments.

The second line of reassurance is the regulation of individual qualifications themselves. Our experience indicates that this too needs to be robust and that, although there is merit in some proportioning of regulation to risk, the high-stakes nature of general qualifications, such as GCSEs and A levels, means that there is seldom a “small problem”. So, for example, a relatively minor issue with a small-entry GCSE can, in terms of public perceptions, place as much risk on confidence in the system as a substantial issue with a larger-entry GCSE.

Clearly, given the number of high-stakes qualifications which will be on offer in Wales – even in a situation in which there is a single provider – the regulation of general qualifications will be a very substantial undertaking. We urge that careful consideration be given to the resourcing implications for Qualifications Wales and to ways in which Qualifications Wales can collaborate with Ofqual and CCEA, where there is emerging good practice in the validation of general qualifications.

While we agree that regulation should consider fitness for purpose of qualifications and ensure that they are suitable for students’ needs, we are concerned about the proposed requirement for awarding bodies to detail evidence of qualifications’ purpose, relevance, value and progression routes. Such a requirement could lead to a narrowing of provision that would not be in students’ interests and could result in qualifications that are suitable in certain contexts becoming unavailable. We also question whether a regulator is best placed to make post hoc judgements about whether a given qualification sufficiently supports its stated aims around student progression.

We believe that providers in discussion with students and parents or carers are best placed to select appropriate qualifications and that the role of government and its agencies should be limited to ensuring the validity and reliability of qualifications through the regulatory process and making essentially subjective decisions about which qualifications should be funded or recognised in the accountability system.

We do not agree that reducing the overall number of qualifications, in and of itself, should be an objective of these reforms, although it may of course be the case that a robust regulatory regime would result in the removal of some low-quality (i.e. insufficiently valid or reliable) qualifications from the market.

Provision of information

AQA agrees that the provision of appropriate information and data is important. We agree that it will be particularly important for Qualifications Wales to ensure that Welsh qualifications are well-understood by stakeholders beyond Wales – particularly employers and higher education institutions.

We agree that high-quality support for teachers is essential to ensure that qualifications are delivered effectively. We believe that the awarding body that provides any given qualification is best placed to provide that support.

Awarding

It is not clear precisely what the proposals in this section of the consultation document might mean in practice. For this reason, we can comment only generally and must await further clarification.

AQA does not believe that it is appropriate for the same organisation to carry out both a qualifications delivery and a regulatory role, particularly in a system in which qualifications are high stakes. We do not agree that it will be possible to prevent a conflict of interest between the proposed regulatory and awarding functions of Qualifications Wales. We do not believe that reserve powers for the Government to intervene would be helpful, since any such powers would by definition undermine the independence of the regulator.

The grading issues in GCSE English in 2012 provide a good example of the need for separation of responsibility for qualification design from regulation.¹²

AQA believes that it is in the best interests of students and the Welsh Government's policy objectives to allow multiple awarding bodies to continue to offer GCSEs and A-levels in Wales, under a robust regulatory regime.

We agree that qualifications provision should meet the needs of all learners, and this is particularly important where qualifications will in practice determine the nature of much of the Key Stage 4 and 5 curriculum for students. We are concerned that restricting provision to a single awarding body will have the undesired effect of limiting choice for students, rather than extending it.

This could happen as a result of the proposal that Qualifications Wales would not award qualifications in small-entry subjects where it was deemed cost-ineffective for it to do so. The economics of the qualifications industry are such that small-entry subjects are loss-making due to high fixed costs; awarding bodies currently use the surplus arising from large-entry subjects to cross-subsidise smaller-entry subjects in order to ensure breadth of provision. If most or all large-entry (i.e. surplus-making) subjects were delivered by Qualifications Wales, it is unlikely that other awarding bodies would be able to continue to offer small-entry subjects in Wales as to do so would be uneconomical. This problem would be particularly acute given a requirement for GCSEs and A-levels in Wales to be offered also through the medium of the Welsh language, introducing additional cost into qualification development and delivery.

The result of such a policy would likely be an inadvertent narrowing of the curriculum and of subject choice, which would neither be in students' interests nor deliver the Welsh Government's policy objective of meeting all learners' needs.

There is a related risk that a number of existing small qualifications, which are highly valued by learners and end-users, will not be available under the proposed model. Whilst the current general qualifications market in Wales is complex, it allows for awarding organisations such as AQA to be able to offer a range of sole-provider qualifications which are not offered by other awarding bodies. AQA is already the sole provider of GCSE and A-level qualifications that are assessed via the Welsh language: GCE Accounting, GCSE Economics and GCSE Law (via direct entry with

¹² Stockford, I. (2013), *GCSE English/English Language in summer 2012: the final word?*. Manchester: AQA Centre for Education Policy and Research.

WJEC).¹³ AQA, due to its size, business model and charitable status, is able to offer a number of A-levels which WJEC does not currently provide.¹⁴

It is our contention that allowing only one awarding body to operate within the general qualifications market within Wales will lead to a reduction in the provision of small-entry, highly valued qualifications, which will reduce flexibility and choice for teachers and learners alike.

We agree that, during any change, it is important to ensure that learners are not disadvantaged or advantaged. Awarding bodies have substantial experience and expertise here, as the successful implementation of changes to A-levels in England in 2010 demonstrated.

We are concerned by the proposal (para 5.36) that the move to a single suite of qualifications will be phased. Whilst we appreciate the rationale – that large-scale change is risky and needs to be managed carefully – there are substantial risks involved in phasing. Careful consideration needs to be given to whether phasing will, in practice, reduce risk or whether it might, in fact, increase it.

On the issue of alternative approaches to awarding, there is insufficient detail in paragraph 5.37 for us to make meaningful comment. If Qualifications Wales is considering a range of alternative approaches to the design, delivery and awarding of qualifications, we urge them strongly to work those approaches up and then consider them in detail. Our experience is that there are often unintended consequences, or issues that become clear when proposals are fleshed out, which place substantial risk on qualifications.

If there are Welsh qualifications which are substantially different from their English counterparts, it will be important for end-users to be able to distinguish between them. The use of the same name (GCSE, A-level) for both is not helpful and we recommend that, if Welsh qualifications are distinct from English ones, the sets of qualifications are named to reflect their uniqueness.

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

The existence of a robust, independent regulator can strengthen public confidence in qualifications.

AQA urges Qualifications Wales to consider carefully how it can ensure that qualifications which are “common” between Wales and England (such as GCSEs and A-levels) command confidence when they differ in key structural elements.

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

AQA urges Qualifications Wales to consider carefully the possible impact on students in Wales of qualifications which differ substantially from those on offer in England. Many Welsh students use their qualifications in England and it is vital, for the students, that they be demonstrably

¹³ Through agreement of the JCQ, for these subjects, WJEC accepts the entry applications from schools, co-ordinates the marking, awards grades and issues results, based on the qualification and assessments developed by AQA.

¹⁴ Accounting, Communication and Culture, Leisure Studies, Anthropology, Critical Thinking, Modern Hebrew, Applied Art and Design, Dance, Panjabi, Archaeology, Environmental Studies, Philosophy, Bengali, General Studies, Polish, Citizenship Studies, History of Art, Science in Society, and Classical Civilisation.

comparable.¹⁵ Higher education accepts the different qualifications offered by the English awarding bodies as equivalent, because they comply with common criteria. If Qualifications Wales wishes to offer qualifications which do not comply with those criteria, then it needs to be confident that they will be accepted as comparable. This is an equity issue for students and could have a substantial impact when students are competing for university places.

9. Do you have any other comments?

AQA would be happy to discuss any of the issues raised above in more detail with Ministers and officials.

¹⁵ As AQA set out in its written response to the Children and Young People Committee of the National Assembly (28th January 2013), 14,978 Welsh learners chose to study at English universities in 2012, placing a premium on the portability of qualifications sat in Wales.

CITB Cymru Wales response to Our Qualifications - our future: Consultation on proposals to establish a new qualifications body for Wales.

CITB Cymru Wales welcomes the opportunity to respond to this consultation. As the Industry Training Board and Sector Skill Council for the construction sector in Wales, we are working to deliver robust and relevant skills to secure economic growth and prosperity through construction and the built environment.

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

It is essential that qualifications in Wales, especially vocational qualifications, meet the confidence and skills requirements of employers. CITB Cymru Wales input into the *Review of Qualifications for 14 to 19-year-olds in Wales*, and as a Sector Skill Council, CITB is a major forum for dialogue between industry, government, education providers, and other stakeholders in ensuring that the construction sector in Wales has the right skills, in the right place, at the right time. An independent qualifications body can foster confidence in the quality of qualifications in Wales, but this independent body, if it is to lead on aspects of qualifications policy development, must remain in continuous conversation with employers and end users, as set out in point 4.8 of the consultation document.

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

It is essential that the governance structures of Qualifications Wales reflect the diversity of qualifications on offer in Wales and the plethora of industries and career routes which qualifications are an entry to. It is important that representatives of Further Education and vocational education are represented within the governance structures and key decision making apparatus of Qualifications Wales.

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

CITB Cymru Wales welcomes the transparency and accountability of Qualifications Wales through the presentation of an annual report to the National Assembly for Wales, which will provide employers and other stakeholders an opportunity to feedback on the organisation's performance. The annual report should also invite/allow for feedback to be received directly by Qualifications Wales and/or the Welsh Government.

Do you have any other comments?

The recent Estyn report, *Training for construction, planning and the built environment*, highlighted the importance of collaboration and partnership between Further Education institutions, Sector Skill Councils and the Welsh Government in ensuring that the content of courses, training and other skills development schemes are relevant and robust. The same is applicable to Qualifications Wales.

CITB Cymru Wales represents over 10,000 construction companies in Wales, with over 4,000 employers actively engaged through our regional construction fora. Our Wales Construction Careers and Skills Provision Advisory Group (WCCSPAG) under the chair of Rhodri Gwyn Jones will act as the Sector Qualifications Advisory Panel for Construction and the Built Environment, as outlined as a recommendation of the *Review of Qualifications*. As such CITB is ideally positioned to advise on skills and training for the construction sector.

Ein cymwysterau – ein dyfodol

Ymgynghoriad ar y cynigion i greu corff cymwysterau newydd ar gyfer Cymru

Ffurflen ymateb i'r ymgyngghoriad

Eich enw: Comisiynydd y Gymraeg

Sefydliad (os yw'n berthnasol): Comisiynydd y
Gymraeg

e-bost/rhif ffôn: post@comisiynyddygyymraeg.org / 0845
6033221

Eich cyfeiriad: Siambrau'r Farchnad, 5 – 7 Heol Eglwys
Fair, Caerdydd CF10 1AT

Dylid dychwelyd ymatebion erbyn **20 Rhagfyr 2013** i:

Claire Habberfield
Y Tîm Deddfwriaeth
Yr Is-adran Gwasanaethau Corfforaethol
Yr Adran Addysg a Sgiliau
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Adran 3: Y ddadl dros newid

Cwestiwn 1 – A oes unrhyw broblemau eraill sy'n amharu ar effeithiolrwydd y system bresennol neu a oes unrhyw wendidau eraill?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Mae'r Comisiynydd yn croesawu awydd Llywodraeth Cymru i symleiddio'r broses o reoleiddio a sicrhau gwell cysondeb o ran ansawdd cymwysterau yng Nghymru. Mae diffyg cymwysterau ac adnoddau addysg cyfrwng Cymraeg wedi ei adnabod fel un o brif rwystrau i ddatblygiad addysg cyfrwng Cymraeg, yn enwedig o fewn meysydd galwedigaethol. Ategir hyn yng nghrynodeb Llywodraeth Cymru o'r ymatebion i'r ymgynghoriad i Adolygiad o Gymwysterau ar gyfer pobl ifanc 14 i 19 oed yng Nghymru. Wrth sefydlu cyfundrefn newydd, bydd yn gyfle i graffu ar ac adolygu sefyllfa cymwysterau cyfrwng Cymraeg yng Nghymru, gan osod cyfeiriad ag amcanion pellgyrhaeddol i ddatblygu cyfres o gymwysterau cyfrwng Cymraeg o safon sydd yn ymateb i'r galw cynyddol am ddarpariaeth cyfrwng Cymraeg ymysg darparwyr Cymru.

Cwestiwn 2 – A oes unrhyw nodweddion penodol o'r system bresennol y byddech yn awyddus i'w cadw?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Credwn y gall cael gwared ar y farchnad gystadleuol warantu gwell cysondeb ar draws y sector. Nodwn fodd bynnag, bod cyfran fach o gyrff dyfarnu eisoes yn darparu cymwysterau yng Nghymru ac wedi gwneud cynnydd da wrth ddatblygu'r ddarpariaeth ddwyieithog a chyfrwng Cymraeg dros y blynyddoedd. Wrth symud tuag at fod yr unig ddarparwr yng Nghymru ar gyfer rhai cymwysterau, bydd angen sicrhau y bydd y ddarpariaeth cyfrwng Cymraeg cyfredol yn cael ei chynnal a'i datblygu ymhellach.

Adran 4: Ein gweledigaeth

Cwestiwn 3 – Beth yw eich barn am y weledigaeth yr ydym yn ei chynnig ar gyfer Cymwysterau Cymru?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Hyd yn ddiweddar, mae penderfyniadau ynghylch cymwysterau wedi eu gwneud ar y cyd â Lloegr a Gogledd Iwerddon. Croesawn y ffaith y bydd y newidiadau arfaethedig yn cynnig cyfle i Gymru ddatblygu system gymwysterau sydd wedi ei theilwra yn benodol i ddiwallu anghenion diwylliannol, economaidd ac ieithyddol Cymru. I'r perwyl hwn felly dymunwn weld cyfeiriad at yr iaith Gymraeg a chymwysterau cyfrwng Gymraeg yng ngweledigaeth Cymwysterau Cymru sydd wedi ei gynnwys ym mharagraff 1.2.

Adran 5: Sut byddwn yn gwireddu'r weledigaeth

Cwestiwn 4 – Ydych chi'n credu y bydd y gweithgareddau a'r swyddogaethau arfaethedig hyn yn gwireddu'r weledigaeth ar gyfer Cymwysterau Cymru?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Mae Strategaeth Addysg Cyfrwng Gymraeg Llywodraeth Cymru yn gosod cyfeiriad strategol ar gyfer datblygu addysg cyfrwng Gymraeg yng Nghymru. Mae'r ddogfen yn gosod dyletswydd ar Lywodraeth Cymru i gydweithio â phartneriaid ac asiantaethau eraill i wireddu'r chwe nod strategol. Wrth drosglwyddo dyletswyddau i Gymwysterau Cymru, bydd angen rhoi ystyriaeth lawn i nodau ac amcanion y Strategaeth gan sicrhau nad yw'r ad-drefnu'n llesteirio unrhyw gynlluniau sydd ar waith ar hyn o bryd ac y bydd unrhyw drefniadau newydd yn hwyluso gweithrediad y Strategaeth.

Wrth graffu ar addasrwydd cymwysterau, bydd angen ystyried i ba raddau y mae'r cymwysterau yn cyflawni eu diben ochr yn ochr â nodau ac amcanion y Strategaeth. Bydd gan Gymwysterau Cymru rôl allweddol bwysig wrth weithredu Nod Strategol 5: *Gwella'r dulliau cymorth canolog ar gyfer addysg a hyfforddiant cyfrwng Gymraeg*. Amlinellir yma'r angen i ddatblygu'r ystod, nifer ac argaeledd cymwysterau cyfrwng Gymraeg ynghyd â'r adnoddau addysgu ategol. Noder hefyd yr angen i safoni terminoleg Gymraeg gyfoes ar gyfer darpariaeth addysg cyfrwng Gymraeg.

Cwestiwn 5 – Beth yw eich barn am y trefniadau llywodraethu arfaethedig ar gyfer Cymwysterau Cymru?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Dim sylw

Cwestiwn 6 – Beth yw eich barn am gylch gorchwyl a swyddogaethau arfaethedig Cymwysterau Cymru? Ydych chi'n meddwl bod ei gylch gorchwyl a'i swyddogaethau yn weddol briodol neu a ddylai gael cylch gwaith gwahanol?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Mae'n allweddol bwysig fod y Bil Cymwysterau, Cwricwlwm ac Asesu (Cymru) yn ei gwneud yn glir union ddyletswyddau Cymwysterau Cymru yng nghyd-destun datblygu cymwysterau ac adnoddau dwyieithog a chyfrwng Cymraeg yn ogystal â phwerau'r corff fel rheoleiddiwr. Mae gan Weinidogion Cymru bwerau statudol i ddirwyo neu gyflwyno cyfarwyddyd i unrhyw gorff dyfarnu a gydnabyddir mewn achos o dorri'r amodau cydnabod. Bydd disgwyl i Gymwysterau Cymru arfer yr un pwerau fel rheoleiddiwr, ac y bydd y gofynion penodol a osodir ar gyrff dyfarnu yn cynnwys yr angen i ddatblygu a darparu cymwysterau ac unrhyw adnoddau ategol yn ddwyieithog neu drwy gyfrwng y Gymraeg.

Llywodraeth Cymru fydd yn parhau i fod yn gyfrifol am benderfyniadau cyllido, ar sail cyngor gan Gymwysterau Cymru. Mae system grantiau'r Llywodraeth ar gyfer datblygu cymwysterau cyfrwng Cymraeg yn blaenoriaethu cymwysterau sydd fwyaf perthnasol o safbwynt anghenion economaidd Cymru. Nodwn nad yw cyfrwng iaith cymhwyster wedi ei gynnwys ym mharagraff 5.21 fel math o wybodaeth y bydd disgwyl i gyrff dyfarnu adrodd arno. Hyderwn y bydd cyfrwng iaith yn un o'r ffactorau y bydd Cymwysterau Cymru yn ystyried wrth wneud penderfyniad ynglŷn â chyllido cymhwyster.

Bydd natur y berthynas gydweithiol rhwng Cymwysterau Cymru a Llywodraeth Cymru yn hollbwysig. Bydd Llywodraeth Cymru yn darparu llythyrau cylch gwaith yn nodi prif gyfrifoldebau'r corff. Er mwyn sicrhau y rhoddir statws uchel i faterion yn ymwneud â'r ddarpariaeth addysgol cyfrwng Cymraeg, bydd angen i'r llythyrau hyn gynnwys cyfeiriad penodol at hynny. O ganlyniad, wrth gyflwyno eu hadroddiad blynyddol gerbron Cynulliad Cenedlaethol Cymru, bydd disgwyl i Gymwysterau Cymru adrodd yn benodol ar ddatblygiadau o fewn darpariaeth cymwysterau cyfrwng Cymraeg. Bydd y ddeddf a fydd yn sefydlu'r corff newydd, hefyd yn darparu pwerau i Gymwysterau Cymru i roi cyngor i Lywodraeth Cymru. Bydd angen felly i Gymwysterau Cymru feithrin a datblygu arbenigedd ym maes addysg a chymwysterau cyfrwng Cymraeg er mwyn cynnig cyngor ac arweiniad i Lywodraeth Cymru yn y maes.

O safbwynt trefniadau cyllido, bydd angen ei gwneud yn glir i ba raddau y bydd y Llywodraeth ac / neu Gymwysterau Cymru yn dyrannu cyllid er mwyn sicrhau buddsoddiad i gyfieithu cymwysterau neu i ddatblygu cymwysterau cyfrwng Cymraeg a dwyieithog.

Cwestiwn 7 – Beth ddylai Cymwysterau Cymru ei wneud i gryfhau hyder y cyhoedd yn y cymwysterau a gynigir yng Nghymru?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Mae sawl cyfeiriad yn y ddogfen ymgynghori at ennyn hyder y cyhoedd yng nghymwysterau Cymru trwy sicrhau eu bod yn gyfwerth o ran safon a statws â rhai gweddill Ewrop a'r Byd. Mae tystiolaeth anecdotaidd yn awgrymu bod rhywfaint o ansicrwydd yn parhau ymysg y cyhoedd ynglŷn â chymwysterau cyfrwng Cymraeg. Dylai Cymwysterau Cymru ymateb i'r pryderon hyn gan ddarbwylllo dysgwyr a'r darparwyr bod cymwysterau cyfrwng Cymraeg yn gyfwerth ac yr un mor gludadwy â'r rhai Saesneg. Wrth ddarparu gwybodaeth am gymwysterau i'r cyhoedd, hyderwn y bydd Cymwysterau Cymru yn hyrwyddo gwerth a manteision astudio trwy gyfrwng y Gymraeg yn unol ag amcan strategol 5.4 Strategaeth Addysg Cyfrwng Cymraeg. Ar hyn o bryd mae gwefannau Llywodraeth Cymru ac Ofqual yn darparu rhestr o'r cymwysterau hynny y gellir eu hastudio trwy gyfrwng y Gymraeg. Hyderwn y bydd Cymwysterau Cymru hefyd yn casglu a rhannu gwybodaeth am gymwysterau cyfrwng Cymraeg. Dylai'r wybodaeth a ddarperir fod yn gyfredol, yn glir ac yn hygyrch i'r darllenwr yn ogystal â thynnu sylw at y llwybrau dilyniant cyfrwng Cymraeg.

Cwestiwn 8 – Yn eich barn chi, sut ac i ba raddau y bydd y cynigion hyn yn effeithio arnoch chi, eich sefydliad, dysgwyr a/neu unrhyw gategorïau rhanddeiliaid penodol?

Nodwch y rhesymau y tu ôl i'ch ateb a'ch sylwadau.

Dim sylw

Cwestiwn 9 – Rydym wedi gofyn nifer o gwestiynau penodol. Os oes gennych chi faterion perthnasol nad ydym wedi rhoi sylw penodol iddynt, defnyddiwch y blwch isod i roi gwybod i ni amdanynt.

Mae adroddiad terfynol Adolygiad o Gymwysterau ar gyfer pobl ifanc 14 i 19 oed yng Nghymru yn datgan mai problemau cyflenwi yw'r rhwystr mwyaf i ddatblygiad cymwysterau cyfrwng Cymraeg yn hytrach na'r cymwysterau eu hunain. Bydd angen i Gymwysterau Cymru fynd i'r afael â'r diffyg adnoddau cyfrwng Cymraeg a'r prinder staff (megis aseswyr a chymedrolwyr) sydd yn gymwys ac yn hyfedr i addysgu neu weithio trwy gyfrwng y Gymraeg.

Nodwn y bydd disgwyl i gyrff dyfarnu gyflwyno tystiolaeth gryfach ynglŷn â'r galw am gymhwyster er mwyn derbyn cydnabyddiaeth gan Gymwysterau Cymru. Nid yw'n glir o'r ddogfen, i ba raddau y bydd Cymwysterau Cymru ei hunan yn gyfrifol am fesur y galw am gymwysterau ac yn blaenoriaethu meysydd i'w datblygu ar sail y wybodaeth honno. Mae rhan helaeth o'r Cynghorau Sgiliau Sector yn gweithredu Cynlluniau Iaith Gymraeg, ac ynddynt yn ymrwmo i fesur y galw am sgiliau yn y Gymraeg o fewn eu sectorau penodol. Dylai Cymwysterau Cymru felly gydweithio â'r Cynghorau Sgiliau Sector i gasglu tystiolaeth am anghenion ieithyddol sectorau a rhoi mesurau mewn lle i ddiwallu'r anghenion hynny.

Wrth reoli'r newid yn ystod y cyfnod interim bydd angen sicrhau bod y gwasanaethau a ddarperir yn gyfartal yn y ddwy iaith. Disgwylid y bydd Cymwysterau Cymru yn gorff a fydd yn cynnig gwasanaethau cwbl ddwyieithog, gan gynnwys ei wyneb cyhoeddus a'i ymwneud ag aelodau'r cyhoedd. Dylid hefyd sicrhau bod unrhyw wasanaethau neu ddarpariaeth gefnogol a gynigir i'r cyhoedd, gan gynnwys hyfforddiant, adnoddau a chanllawiau ar gael yn ddwyieithog.

Mae ymatebion i ymgynghoriadau yn debygol o gael eu gwneud yn gyhoeddus, ar y rhyngrwyd neu mewn adroddiad. Os byddai'n well gennych i'ch ymateb aros yn ddiennw, ticiwch yma:

☐

Qualifications Wales

FSB Wales response to Welsh Government

17th December 2013





Qualifications Wales

The Federation of Small Businesses Wales

The Federation of Small Businesses Wales welcomes the opportunity to present its views to the Welsh Government on its proposed vision for Qualifications Wales. FSB Wales is the authoritative voice of small businesses in Wales. With 10,000 members, a Welsh Policy Unit, two regional committees and twelve branch committees; FSB Wales is in constant contact with small businesses at a grassroots level. It undertakes a monthly online survey of its members as well as an annual membership survey on a wide range of issues and concerns facing small business.

1) Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

FSB Wales believes the consultation document has correctly identified the issues that surround the quality assurance of qualifications in Wales at present. It is fair to say that the marketisation of qualifications has led to an element of complexity and confusion in the qualifications system in Wales, as identified in the consultation. Consequently, businesses report that they are less inclined to see qualifications as relevant to their 'real world' circumstances and are more likely to reflect the needs of education and qualification providers.

In the view of FSB Wales, the continued proliferation of inappropriate qualifications needs to be addressed by Qualifications Wales. We are also of the view, that many members and businesses view the practice of unlimited re-sits and early entry for examinations as potentially devaluing the achievements of learners. This is perhaps symptomatic of the qualification system encouraging 'teaching to the test' as opposed to measuring appropriate skills.

One area that requires particular attention is the state of the National Occupational Standards. FSB Wales feels that the uncertain future of NOS could be detrimental to the standards of vocational qualifications in the future. Furthermore, the current methods of engagement with the private sector, in particular through the Sector Skills Councils, are under strain. SSCs currently have a UK wide remit and are funded by the UK Government.

As such, their focus is largely on issues in England. While this is not a huge problem it could cause concern in the future, particularly if NOS is under threat. Engagement with employers is essential to the success of Qualifications Wales and the Welsh Government has correctly identified this as a priority. As such, the capacity of SSCs and other organisations to engage with Wales-only qualifications should be kept under review.

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

While much of the purpose of the establishment of Qualifications Wales is to ensure qualifications provided in Wales meet the needs of learners in Wales, FSB Wales would welcome the continuation of strong cross-border working with the four UK nations and with other European countries. This should recognise the independence of Wales' qualification system but seek to learn from best practice elsewhere, not detracting from the ability to deliver made in Wales solutions.



3) What are your views on our proposed vision for Qualifications Wales?

FSB Wales welcomes the Welsh Government's vision for Qualifications Wales. In particular, the focus on qualifications that are to be provided as part of the reformed Welsh Baccalaureate is vital. However, FSB Wales believes Qualifications Wales' functions should be wide enough to ensure the principles of skills development, as encapsulated in the Welsh Baccalaureate, are applied in the quality assurance process for all qualifications. While Qualifications Wales' focus at the outset will be reform of qualifications to facilitate the Welsh Baccalaureate, FSB Wales believes Qualifications Wales should be equipped to properly regulate market qualifications for post-16 learners.

It is also important that Qualifications Wales is able to reflect its need for stakeholder engagement in delivery and pays particular attention to engagement with employers to ensure qualifications are equipping Wales' young people for employment. The remit letter of Qualifications Wales should reflect this by clearly stating the need to for Qualifications Wales to focus on equipping Wales' young people with the skills needed for employment.

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

FSB Wales agrees with the transfer of regulatory powers to Qualifications Wales from the Welsh Government. However, careful consideration should be made to ensure continuity between the curriculum at key stage 3 and key stage 4 study. In particular, FSB Wales would welcome the Welsh Government being able to specify requirements around core skills in qualifications such as literacy and numeracy, as suggested in the consultation document¹.

In quality assuring qualifications in the 14-19 age group, Qualifications Wales should be equipped with powers to ensure that qualifications in all streams (academic and vocational) are quality assured against the wider employability skills in the Welsh Baccalaureate. While it is envisaged that market elements of core Welsh Baccalaureate qualifications will be phased out and replaced with Qualifications Wales oversight, FSB Wales would argue that Qualifications Wales should also play a fundamental role in overseeing quality assurance of post-16 vocational skills, to ensure they also contribute to the employability aims of the Welsh Baccalaureate.

This is particularly important for those who have not successfully completed the Welsh Baccalaureate at the 14-16 age group. In this instance, Qualifications Wales should be able to ensure that any qualifications assured post-16 are able to fit within the Welsh Baccalaureate framework to enable those who have not achieved the Welsh Baccalaureate when leaving school are able to continue their skill development towards attaining later on in life. FSB Wales believes that Qualifications Wales should be able to regulate the market for qualifications post-16 to ensure there is not a disconnection between the available qualifications and key skills required under the Welsh Baccalaureate.

5) What are your views on the proposed governance arrangements for Qualifications Wales?

FSB Wales believes strong accountability measures are needed to ensure performance is scrutinised by the National Assembly for Wales and wider civic society. This should include an annual reporting

¹ P.22



mechanism to the National Assembly for Wales and scrutiny in the Children and Young People Committee or its equivalent. We would advocate the Welsh Government moving swiftly to appoint a shadow Chief Executive to the role to allow for strong direction and leadership. The remit letter of Qualifications Wales should also be made public so stakeholders are aware of the organisation's objectives.

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

The scope and powers outlined in the consultation document are adequate to fulfil the role intended for Qualifications Wales. FSB Wales is broadly supportive of moves towards Qualifications Wales being the sole provider (or in partnership with other organisations) of core qualifications in Wales. However, further detail is needed on how the Welsh Government intends to separate the quality assurance and awarding functions of the new body.

7) What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

The Review of Qualifications suggested a public campaign would be of benefit to ensure employers are aware of the proposed changes. FSB Wales agrees that this would be beneficial both in Wales and across the UK. FSB Wales will work closely with Welsh Government's Department for Education and Skills to inform our 10,000 members of the changes where possible.

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

The proposals outlined in the consultation will allow for greater engagement on qualifications at a Wales level. FSB Wales hopes that the Review of Qualifications will be implemented in full and the establishment of Qualifications Wales is a key step in this. A renewed focus on literacy, numeracy and employability skills will help improve Wales' competitiveness. This should be intrinsically linked with the reform of the curriculum and of the Welsh Baccalaureate.

9) Do you have any other comments?

FSB Wales feels that the Welsh Government should ensure that this process does not take place in isolation. There is considerable strain on Wales' education system at present, with recent PISA results and reforms to the curriculum taking place. It is therefore crucial that all interventions are pursuing the same objectives. Failure to achieve this could lead to unnecessary complexity and a lack of confidence from employers in Wales.

**Contact:**

Federation of Small Businesses
WALES OFFICE
1 Cleeve House
Lambourne Crescent
Llanishen
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The Federation of Small Businesses

The FSB is non-profit making and non-party political. The Federation of Small Businesses is the UK's **largest campaigning pressure group** promoting and protecting the interests of the self-employed and owners of small firms. Formed in 1974, it now has **200,000 members across 33 regions and 194 branches**.

Lobbying

Our lobbying arm - led by the Westminster Press and Parliamentary office - applies pressure on MPs, Government and Whitehall and puts the FSB viewpoint over to the media. The FSB also has Press and Parliamentary Offices in Glasgow, Cardiff and Belfast to lobby the devolved assemblies. Development Managers work alongside members in our regions to further FSB influence at a regional level.

Member Benefits

In addition, Member Services is committed to delivering a wide range of high quality, good value business services to members of the FSB. These services will be subject to continuing review and will represent a positive enhancement to the benefit of membership of the Leading Business Organisation in the UK.

Vision

A community that recognises, values and adequately rewards the endeavours of those who are self employed and small business owners within the UK

The Federation of Small Businesses is the trading name of the National Federation of Self Employed and Small Businesses Limited. Our registered office is Sir Frank Whittle Way, Blackpool Business Park, Blackpool, Lancashire, FY4 2FE. Our company number is 1263540 and our Data Protection Act registration number is Z7356876. We are a non-profit making organisation and we have registered with the Information Commissioner on a voluntary basis.

Associate Companies

We have two associated companies, FSB (Member Services) Limited (company number 02875304 and Data Protection Act registration number Z7356601) and NFSE Sales Limited (company number 01222258 and Data Protection Act registration number Z7315310).



Grŵp
**Llandrillo
Menai**

Glyn Jones OBE
Chief Executive Grŵp
Llandrillo Menai

Grŵp Llandrillo Menai welcomes the opportunity to respond to the Welsh Government's consultation 'Our qualifications – our future'.

Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: Glyn Jones OBE

Organisation (if applicable): Grŵp Llandrillo Menai

e-mail/telephone number:

ghi@gllm.ac.uk

01492 542301

Your address:

Grŵp Llandrillo Menai

Llandudno Road

Rhos-on-Sea

Colwyn Bay

LL28 4HZ

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Grŵp Llandrillo Menai welcomes the opportunity to respond to the Welsh Government's consultation 'Our Qualifications – our future'. Grŵp Llandrillo Menai is the largest further education college in Wales. It employs 2,000 staff and delivers courses to 34,000 students across four counties in campuses from Denbigh to Dolgellau, as well as business and research facilities.

Grŵp Llandrillo Menai is focused on providing the skills that ensure competitiveness and success for the North Wales economy, by widening opportunities through an expanded curriculum and offering improved progression opportunities for learners. Due to the size and complexity of Grŵp Llandrillo Menai and the vast range of qualifications on offer, this institution currently deals with 41 awarding bodies, which as we are sure will be appreciated, results in an inordinate amount of bureaucracy.

We broadly endorse the approach and direction advocated by Colegau Cymru in its response to the Qualifications Wales Consultation. We have both reinforced some of these points and collated additional ones in our responses to the questions posed in the Consultation.

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

Awarding bodies in the UK compete with each other for market share and this practice is long established and has led to strong associations between large English providers and the awarding bodies concerned. Wales, by contrast, does not have the critical mass in the qualifications market.

The awarding bodies are often powerful international organisations with a political and financial influence and they are not easy to persuade to embrace Welsh providers and learner needs; this is a current weakness.

We fully support the drive for simplification and consistency within this initiative and believe that it is very desirable and important to have a Qualification system in Wales which is consistent, transparent, fair, and above all, simplified in terms of equivalence and bureaucracy.

There has been little commonality in the approach taken to qualifications reform within the UK. In some instances it appears as though the UK Government has not properly consulted with the other two countries on the future of important qualifications such as GCSEs and A-Levels. This demonstrates the need for an effective qualifications agency that can put the need of Wales' learners first.

The current system has not yet addressed certain structural issues relating to the funding of education and the ways that performance measures relating to qualifications differ between types of providers. 'Successful completion', for example, is a key measurement for colleges but not schools. We welcome the recent announcement proposing to develop and implement a consistent set of performance measures for the post-16 sector.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

Grŵp Llandrillo Menai values the international recognition of certain qualifications (A-levels, GCSE's, some vocational qualifications). These are well known among employers and organisations in the UK. We therefore welcome the continuation of these qualifications brands to ensure both the credibility of the Welsh Qualification systems and our opportunities as Welsh Colleges in recruiting internationally.

The current system of generally having a significant element of non-terminal assessment in both GCSEs and A-levels is also one that merits retention. Most HE courses in the UK now include a significant element of non-terminal assessment and the principle of assessment outside of examinations in a one or two year qualification is one that we uphold.

Grŵp Llandrillo Menai also supports the retention of the AS level in Wales.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

The vision outlined in the document is well thought through ensuring that qualifications in Wales are relevant and suited to the needs of employers and higher education providers in Wales and beyond.

Grŵp Llandrillo Menai supports the proposals to reduce the number of qualifications on the approved list of fundable qualifications. We do however, value a degree of choice in the qualifications that we use in relation to vocational qualifications and that an appropriate balance between reducing qualifications and retaining choice shall be retained. We believe that Qualifications Wales would be acting reasonably in reducing the number of qualifications on its approved list for funding.

The consultation document is right to point to the importance of making professional support available for teaching and management staff and new qualifications require proper training and preparation.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Grŵp Llandrillo Menai supports the proposal that Qualifications Wales become an awarding organisation. The proposal to phase the introduction of the awarding organisation function is a sound one as any risk of disruption to learners must be avoided.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

The governance arrangements will need to reflect separation of the regulatory and awarding functions of Qualifications Wales.

For this purpose, it may be appropriate to have different reporting structures, cost centres and lines of accountability to deal with the separate functions that it will exercise.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

The scope and functions of Qualifications Wales are appropriate. The focus on quality enhancement for qualifications is a particularly important area to keep pace with the need of a quickly evolving occupational environment in many areas for example, in the growing area of apprenticeships and the occupational standards related to them.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

Public confidence can only be secured however if people are aware of the new qualifications system in Wales through a concerted, high profile and sustained communications campaign to ensure that parents, learners and employers are made fully aware of the new body.

Great care will need to be taken in the early stages to minimise errors of administration which will immediately undermine the new body's reputation. Consistency and simplicity will also be features that will consolidate public and learner perception. The provider network and particularly Colleges in Wales can be used as conduits of positive information to learners and their parents / spouses.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

Grŵp Llandrillo Menai believes that learners will benefit considerably from having a qualifications system that helps:

- secure qualifications which, if passed, enable learners to progress to a higher level of educational attainment;
- ensure qualifications that equips learners with a suite of world class skills that will help them pursue a rewarding career, or start up a successful business or social enterprise, and;
- provide qualifications that will help people them to live in the Wales or the wider world, assisting them in living in a bilingual and socially inclusive society.

Question 9 – 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.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

19 December 2013

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

Dear Ms Habberfield

HEFCW response to *Our qualifications our future- consultation on proposals to establish a new qualifications body for Wales*

The Higher Education Funding Council for Wales (HEFCW) welcomes the opportunity to respond to the Welsh Government's *Our qualifications - our future* consultation on proposals to establish a new qualifications body for Wales.

Context

In responding to this consultation we recognise that higher education institutions (HEIs) in Wales are better placed than us to respond to the detail of the issues raised and that Qualifications Wales will not cover HE qualifications. In addition, many qualifications are recognised as HE entry qualifications and HE admissions is an area of institutional autonomy. Therefore, it is inappropriate for us to respond to all of the consultation questions. Our response is framed more broadly and reflects our Corporate Strategy priorities of widening access to higher education and the student experience¹.

Furthermore, we recognise that all HEIs operate within a UK and international environment and that education policy in Wales is a Welsh Government devolved responsibility. Within this context, and with increasing current, and potential future, policy differences across the UK administrations, it is essential that: qualifications in Wales are highly-regarded and clearly understood by all UK HEIs and employers; that Welsh HE applicants are not inadvertently disadvantaged in terms of HE admissions or employability; and that Welsh HEIs can compete effectively in a diverse market with all UK higher education providers.

¹ [HEFCW's Corporate Strategy](#)

Vision, scope and function (consultation questions 4 and 6)

We welcome the confirmation that Qualifications Wales will not quality assure degrees and other similar courses, as these are a matter for universities, but draw attention to the statutory responsibility on HEFCW to ensure that assessment is made of the quality of provision in institutions that we fund. At the moment, as with other UK Funding Bodies, we deliver that responsibility for higher education through a service level agreement with the Quality Assurance Agency for UK Higher Education.

We welcome the proposed vision for Qualifications Wales and would add principles that include *‘Ensuring opportunities which enable learners in Wales to access UK-wide and international higher-level learning and employment opportunities’* and *‘ensuring systems which support parity of esteem and equality of learning opportunities’*. We would also welcome a clearer reference within the vision statement to promoting qualifications that support the Welsh language and a bilingual Wales.

We welcome the role of Qualifications Wales in maintaining the quality, currency and competitiveness of Welsh pre-HE qualifications to support social justice, social mobility and a buoyant economy in the long-term. We welcome the central role of Qualifications Wales in ensuring high-quality qualifications and in strengthening public confidence in, and information about qualifications in Wales. Recognition, understanding and confidence in Welsh qualifications must be maintained and articulated throughout Wales, the UK and internationally to ensure Welsh qualifications provide access to *all* universities, colleges and employers.

We recognise the importance of access to a range of Welsh medium qualifications and progression routes to meet the needs of Welsh medium learners and we support actions to generate further demand for Welsh medium learning, skills and employment at all levels. We support the Qualifications Wales role in encouraging qualifications and curricula which take account of Wales-specific content. We will encourage the Coleg Cymraeg Cenedlaethol to work closely with Qualifications Wales to ensure higher-level Welsh medium progression routes are available and that learners have the academic skills and confidence to access, and succeed in, Welsh medium higher education and employment².

Strengthening public confidence in qualifications offered in Wales (consultation question 7)

Qualifications Wales should undertake a Wales-, UK- and international, long-term campaign to promote understanding of qualifications in Wales. These actions will

² See [Y Coleg](#)

ensure that difference does not create artificial barriers for learners accessing provision outside Wales.

We would caution Qualifications Wales from too great a divergence from a shared understanding of UK qualification brands to avoid confusing and/or diluting brand identity and limiting learning opportunities, should some awarding bodies consider Wales-only awards not to be commercially viable options. Another area where caution will be required is in ensuring that articulation between FE and HE, supporting progression from FE to HE, is not adversely impacted upon by changes to qualifications and/or lack of understanding about qualifications in Wales. More limited articulation to qualifications outside Wales might also be an unintended consequence of divergence from a UK model and brand. Qualifications Wales will want to consider challenges that arise when direct comparisons between learners' experiences become complex, potentially resulting in Welsh applicants being less likely to benefit from opportunities provided by this holistic approach to admissions, including the increased use by UK higher education of contextualised data. We must avoid increasing barriers to UK HEIs and impacting negatively on fair access to higher-level learning, the professions and social mobility

Impact on HEFCW (consultation question 8)

As we noted above, and the review recognises, higher education qualifications are not within the remit of Qualifications Wales but part of the Quality Assurance Agency framework for higher education³.

We stand ready to work with Qualifications Wales, particularly in ensuring Welsh medium opportunities and effective progression pathways for all learners to higher education, higher level learning and skills and to recognising fully lifelong learning outcomes.

We welcome the role that Qualifications Wales will play in providing support and advice for partners such as HEFCW and the higher education sector. Support and advice will be required for all HEIs across the UK and beyond to ensure that Welsh qualifications are understood and do not become a barrier to accessing HE.

Additional Comments (consultation question 9)

Development and approval of new qualifications

We understand that some Universities are involved in contributing to some post-16 curriculum and qualification developments and HEIs may welcome further involvement, though we are mindful of the considerable resource implications of this. University engagement with qualification and curriculum development would ease

³ [QAA Qualifications Framework for Higher Education](#)

transition between Key Stage 3 and HE level 4 qualifications and contribute to staff development across these areas. In engaging with universities, Qualifications Wales would need to ensure that the views of all types of UK HEIs were adequately reflected to ensure 'buy in' across the UK HE sector, avoid learners in Wales being geographically limited in study locations available to them and avoid alignment of specific ranges of qualifications with particular types of higher education institutions. Limited 'buy in' could impact adversely on widening access students' progression to higher education.

Information advice and guidance

Finally, we consider it essential that learners have access to high quality information, advice and guidance to enable them to make appropriate qualification choices and access their chosen pathway. We are developing closer working arrangements with Careers Wales to inform learner choice and we are ready to support the family of careers services in Wales and Qualifications Wales to ensure that learners in Wales achieve their full potential.

We confirm that our response to this consultation can be made public.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Blaney', written in a cursive style.

David Blaney

20 December 2013

Huw Lewis
Minister for Education and Skills
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
DF99 1NA

Office of Qualifications
and Examinations Regulation
Spring Place
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Telephone 0300 303 3344
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Dear Minister

Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

I am writing on behalf of Ofqual in response to your consultation on the establishment of Qualifications Wales. There are three points we wish to make.

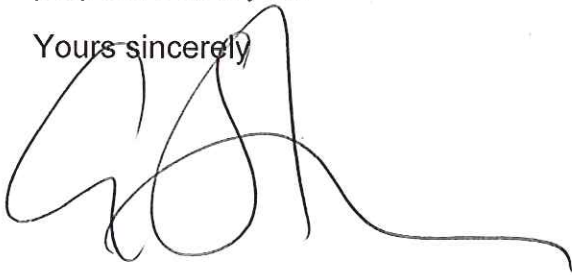
Firstly, the proposal to create Qualifications Wales sits alongside reforms to GCSEs and A levels in both countries, and the changes together are likely to affect how exam boards operate in Wales. Where exam boards operate in both countries and offer different qualifications in each, we will have a joint interest in their ability and capacity to do both, and we have agreed with your officials that we should work together where we can to identify and evaluate the risks that may arise.

Secondly, the changes lead us to consider the regulatory relationship and arrangements as between England and Wales. We wish to continue to work together where doing so helps ensure the standards of the qualifications we each regulate, and to keep each other informed over reforms wherever appropriate. But the old ways of doing business together as one need to be replaced by new arrangements more suitable to the increasing diversity between the qualifications we each regulate. The Concordat that our officials have under development will help form the basis of that new approach.

Lastly, GCSE and A level brands are well known and established, and widely valued. In future GCSEs and A Levels in each country could differ significantly in terms of content, structure and/or assessment methodology. Depending on the differences, it may not be possible to ensure common standards. We are considering the implications - for example, in terms of titling – and will continue to liaise with your officials.

I hope that this letter is helpful, and that we might meet as soon as possible. Ofqual will in the New Year be launching a consultation on GCSE standards for our new GCSEs in England from 2017 and I would like to have the opportunity to discuss the proposals with you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Glenys Stacey', with a long horizontal flourish extending to the right.

Glenys Stacey
Chief Regulator

Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: Rachel Searle

Organisation (if applicable):
The JSSC group (Skills for Justice)

e-mail/telephone number: rachel.searle@sfjuk.com
07741 249437

Your address: 1, Caspian Point, Pier Head Street,
Cardiff. CF10 4DQ

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

JSSC is the umbrella organisation that incorporates Skills for Justice and Financial and Legal Skills Partnership. Our joint licence as a sector skills council (SSC) covers around 3.5 million working people, the equivalent of 13% of the overall UK workforce. They work in police forces and law enforcement agencies; courts, tribunal & prosecution services; forensic science services; custodial care; fire and rescue services (FRS); armed forces; local and central government; the voluntary and community sector; legal and financial services and the accountancy sector. These sectors provide critical public functions within UK society, including providing the safe environment required for business, individuals and communities to thrive. Further, according to Gross Value Added data (GVA), the accountancy, financial and legal services sectors, referred to as professional services, contribute £11bn to the UK economy (9% of the overall economy), and are growing by 140% compared to a UK average of 56%. Our sector comprises of the spectrum of private, public and voluntary sector organisations and includes large, medium and small scale employers including freelancers.

The Justice and Community Safety sector in Wales employs over 33,000 people (approximately 4% of the UK). Recent figures suggest that the proportion of the justice sector workforce in Wales with the highest level of qualifications is higher (49%) than that of the whole economy (36%). The proportion of workers at the other end of the spectrum (below Level 2 qualifications) is lower at 18%, compared with 27% in the whole economy.

We welcome the opportunity to contribute to this consultation on proposals to establish a new qualifications body for Wales. We are largely supportive of the recommendations made in the Review of Qualifications for 14 to 19-year-olds in Wales published in November 2012. If implemented appropriately we agree that they will have a positive impact on the qualifications system and standards in Wales. We have considered this consultation carefully and wish to highlight a few areas where we think there is potential risk to successfully meeting the ambitions of Welsh Government.

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

We feel that the Review of Qualifications for 14 to 19-year-olds in Wales identified the barriers and weaknesses that most urgently need to be addressed. We would highlight the lack of understanding, and consequently, lack of parity between vocational and academic success. We would hope that the work of Qualifications Wales (QW) will improve this situation and would suggest that the body holds a specific remit for improving awareness and understanding of the value of vocational education.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

We are pleased that the consultation document references National Occupational Standards (NOS) and the value that they add. The consultation rightly explains that NOS can be used for a number of learning and development tools and processes (qualifications, recruitment, career development etc.).

We are concerned by the apparent move away from NOS in England and would caution against this in Wales. We have advised Central Government that this will cause cross-border, transferability issues for learners and employers.

Many of the employers we work with have a UK-wide remit and it is helpful to them that NOS continue to be used in Wales, Scotland and Northern Ireland. We have used NOS to develop the Policing Professional Framework, literally transforming policing into a recognised profession. We are also working with four police forces in Wales to develop an accredited entry route for new entrant police constables. We are now seeking funding to map uniformed and non-uniformed roles to the QCF in order to develop progression pathways (based on competencies and skills) that will provide a progression route through to Higher Education qualifications.

We are also seeing increasing demand on an international level with countries looking to the UK for expert assistance in developing high quality NOS. Therefore if Welsh Government is to achieve its ambition for Welsh qualifications to be recognised beyond its borders, whilst reducing undue influence of others it should continue to invest in NOS.

We will continue to work with Welsh Government to ensure that NOS are fit for purpose and good value for money.

Equivalences

We agree that it is important to provide Welsh learners with qualifications that are suited to their needs. We would anticipate some difficulties in transferability across borders which could cause a number of problems for learners and UK-wide employers. We absolutely support the ambition that Welsh qualifications should be recognised outside of Wales however; we know that this can be challenging. For example, no Functional Skills equivalence is given to Scottish qualifications in English apprenticeships which causes problems for Scottish apprentices in UK-wide organisations; they are required to take English Functional Skills to complete their apprenticeship.

QCFW

The use of QCFW alongside the English QCF is an effective and efficient way of developing qualifications for shared use in England and Wales. We would recommend maintaining the use of the QCFW to minimise disruption, avoid employers incurring additional costs and to support interoperability.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

We support the vision in terms of its regulatory role. We agree that this will help to strengthen the quality and reputation of qualifications in Wales. However; we do have concerns about Qualifications Wales also having an awarding function. Please see our response to question 6 for further comment on this.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Overall we agree that the proposed activities are a sensible approach to achieving the vision for Qualification Wales. We would like to offer our assistance to support the implementation of the proposals where appropriate.

Employer Engagement

As a Sector Skills Council we know how important it is for employers to engage with qualification development and delivery. We also know how challenging it can be to bring together employers, learning providers and other relevant stakeholders. We are keen to offer our support by working with Qualifications Wales to make use of our channels to employers and the intelligence we hold.

We host employer group meeting in Wales which brings together key employers from our sector and other interested parties such as learning providers. This could be a valuable forum for Qualification Wales to engage with and we would welcome the new body's input.

Furthermore, we welcome the recommendation in last year's review of qualifications to 'fund Sector Skills Councils...to carry out a relevance rating of vocational qualifications to inform the work of [sector qualification advisory] panels, and to identify gaps in provision.' We look forward to supporting the important work of the panels.

Engaging with school-leavers

We also know that it can be difficult for schools to engage with employers and access the necessary information to provide good careers and education information, advice and guidance (CEIAG). This is another area where we would hope to assist Welsh Government to achieve its ambition. We have developed a dedicated service that brings school-leavers and employers in our financial and legal services sectors together.

[Directions](#) is a complete online guide to careers in our industry, helping to attract talent and stimulate interest across the sector. 'A unique channel for our employer partners to offer fresh opportunities and engage with a younger audience.' The

service is widely used and highly regarded by employers in these professions and we are using the model as good practice, hoping to replicate it to make it available to more employers in the JSSC footprint. We would be happy to discuss Directions with Qualifications Wales as an example of a successful approach to employer/school engagement.

Apprenticeships

We have had great success in helping employers to develop high quality apprenticeship frameworks. The consultation implies that the qualifications referred to as sitting within the remit of Qualifications Wales do include apprenticeships but there is little detail about how Qualifications Wales will be involved in the process. We would welcome further information to ensure that we can continue to support our employers in developing the frameworks they want. If the establishment of Qualifications Wales does have a significant impact on the development of apprenticeships we would like to work closely with the body to enable us to guide our employers through the transition and help Qualifications Wales to engage positively with them.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

We agree that Qualifications Wales should be an independent organisation. The level of detail provided shows that the establishment of the body has been well thought through. We would again (see q 6) highlight the problems that could occur as a result of being both a regulatory and awarding body. This will be further highlighted by the increased level of scrutiny and additional requirements proposed. If the perception is that the same does not apply to Qualifications Wales, there is a risk that it could be seen as a state-led approach to qualifications development. We would welcome further clarification of how Qualifications Wales will be held to the same standards and be subject to the same interventions. This is addressed in paragraph 5.28 by reference to a duty placed on Qualifications Wales to ensure that there are no conflicts of interests, however; there is no explanation of how this will happen.

The ability for Qualifications Wales to charge fees for their qualifications, whilst understandable, further undermines its independent status as a quality assurer.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

Whilst we understand the difficulties that have been identified in relation to using a market structure for awarding bodies, we are concerned that the intended remit of Qualifications Wales would include both the regulation and the awarding of qualifications. Although the consultation attempts to allay fears of conflicts of interest it does not sufficiently explain how it will achieve this. If the public are not adequately reassured then confidence in qualifications may be reduced rather than improved.

Moreover, the consultation makes clear that where other awarding organisations are used, they will be subject to far more stringent requirements. We are not in principle against this; however, it would seem that this will give Qualifications Wales an unfair advantage in the market. It would not be appropriate for Qualifications Wales to investigate their own premises, nor would they be likely to fine themselves. Therefore, they will be working in an environment where they will be able to award qualifications at lower risk and cost than their market competitors. If Welsh Government directs Qualifications Wales to be the only body able to award

qualifications such as GCSEs, and at the same time allows them to charge a fee, the Government must be careful not to fall foul of manipulating the market for their own benefit. In addition to this, the consultation suggests that Qualifications Wales might provide some of the awarding functions 'working with or merging with, one or more awarding bodies'. Other awarding bodies may see this as putting them at a disadvantage. It will also be helpful to be transparent about why Qualifications Wales chooses to work or merge with a particular awarding body to avoid any notion of favouritism.

We would encourage further consideration of whether this is the best approach. If Welsh Government consider to progress as proposed, we would welcome further information about how Welsh Government will ensure that Qualification Wales carry out these two important responsibilities with true impartiality. Any such measures should be demonstrable to reassure other awarding bodies and the public.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

We support the majority of proposals and the general approach outlined, with the exception of the proposed awarding function and arrangements which we believe need further consideration. As mentioned, the potential conflict of interests, or appearance of a conflict of interests could actually reduce public confidence in the qualifications offered in Wales. Furthermore, as this risk would only apply to the qualifications awarded by Qualifications Wales the body itself, and its other functions, could be undermined.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

There is huge potential for the establishment of Qualifications Wales to benefit the employers that we work with. This is a timely opportunity to strengthen engagement between employers and learning providers and we look forward to helping to bring this about. We would welcome a conversation with Welsh Government about how we can usefully be involved to support the development and future work of Qualifications Wales.

Question 9 – 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.

If Qualifications Wales is to take on an awarding function we predict that larger awarding bodies will be reluctant to award small numbers of qualifications. [SFJ Awards](#) (awarding organisation in the JSSC group) has an excellent track record in awarding niche qualifications for employers in our sector and would be happy to work with Qualifications Wales and the Welsh Government to manage this likely change to the environment.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

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www.ucas.com

Dear Owen,

I am writing to you to express my thoughts regarding qualifications and regulation reform in Wales. As you will be aware, UCAS has continuously engaged with the debate surrounding qualifications reform. UCAS' position as the central application service provides us with a unique insight into the way qualifications are used for progression into HE and we would be more than happy to discuss about how our data could inform future developments in Wales with the Welsh Government, and in the future Qualifications Wales.

Qualifications Wales

UCAS broadly supports any initiative that seeks to ensure that the qualifications that learners undertake are high quality, rigorous and offer a wide range of progression opportunities. It is important that young people have a broad range of qualifications and progression routes available that suit their aspirations and that this selection is supported by high quality information, advice and guidance.

I also note that the consultation document makes a number of references to the need to provide a broad range of stakeholders with high quality information regarding qualifications. The provision of this information is particularly important due to the significant amount of reform currently being undertaken throughout the UK.

UCAS is currently looking at ways in which it can support the HE sector by providing high quality qualification information to our members through the New Qualification Information Service (NQIS) project. This includes the replacement of the current UCAS Tariff with a new, simpler points system. We have been working with representatives from Welsh Government as we continue our efforts with this project and look forward to continuing this work with both yourselves and Qualifications Wales.

Reform to A levels in Wales

UCAS recognises that the qualifications landscape is becoming increasingly diverse across the UK, particularly in relation to A levels and GCSEs. The current direction of travel for reform suggests that we may see fundamentally different qualifications in England, Wales and Northern Ireland but with the same title. For example, A levels in Wales will retain the AS component, whereas the AS is to be "decoupled" from the A level in England. We are also seeing fundamental differences to GCSE qualifications throughout the UK.

The divergence of qualifications raises a number of potential issues in relation to education progression and cross border flows of students. For 2013 40% of Welsh domiciled students accepted on HE courses were accepted outside of Wales. The majority of these learners will be holding A level qualifications, therefore it is particularly important that A levels across the UK are of the same standard and provide equal opportunities across the UK, regardless of where they are gained. Therefore, we believe that it is important that the regulators and relevant departments in England, Wales and Northern Ireland work together in order to ensure consistency and standards across qualifications of the same title.

It would not be appropriate for UCAS to comment on a preferred model for the contribution of the AS to the full A level. However, it is important that the Welsh Government clearly communicate the level of contribution the AS makes to the overall A level to a wide range of audiences, including Higher Education Providers (HEPs). HEPs will need to know how these revised qualifications differ from their previous incarnation. This is particularly important if in the first instance we see a range of A levels that have different levels of contribution.

We would also wish to once again stress the value of comparability of standards across the UK in relation to AS and A levels, therefore we welcome the proposed sharing of content.

I hope our comments have been useful. If you would like to discuss any of the points raised further please do not hesitate to contact myself or my colleague Ben Jordan (b.jordan@ucas.ac.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Farragher', with a long horizontal stroke extending to the right.

Margaret Farragher

Qualifications and Education Specialist, Policy and Research

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Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

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Responses should be returned by **20 December 2013** to:

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Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

Despite its complexity and bewildering breadth, the current system has failed to provide a range of universally recognised courses and qualifications that are fit for purpose for all learners in our inclusive system. Learners with significant additional needs are especially poorly served in this respect as are vocational learners wishing to pursue vocational education and training beyond 16 through the medium of Welsh.

One of the most common reasons for the proliferation of qualifications can be seen in the need for providers to cater for a diverse number of needs and abilities in single settings. In response to perceived demand, awarding bodies have produced qualifications that meet a perceived 'market' of need. The complexity of the system is thus a product of the complexity of student need. This trend has been exacerbated by the emergence of high-stakes accountability systems.

The proposals set out by the Government have the potential to reduce this complexity and trim the costs of the system in an era of relative austerity. However, it is vital that the emergence of a single body and single awards do not create a 'one-size-fits-all' qualifications offer that will deter rather than engage those most in danger of disengagement or which might create barriers to the gateways of higher educational providers beyond Wales.

How far we can meet the challenges inherent in this quantum change of policy and provision will rest on the proposed bodies ability to develop in a relatively short time frame the kind of academic' vocational and entry-level skills qualifications that will both allow progression through to worthwhile employment and be acceptable to employers and other stakeholders. **The concept of international (European) benchmarking is extremely important in this latter context and should be written into the legislation.** We welcome in this light the proposals on Apprenticeships and Lifelong Learning set out in sections 5.14 and 5.15

The current system and the proposals place the Welsh Baccalaureate at the centre of activity. It is very right that this is so. However, the Welsh Baccalaureate is not currently valued as highly as it should be and is not fit for purpose in many centres in its provision for higher ability learners. We strongly support the development of the Welsh baccalaureate as a universal and over-arching qualification so long as it is robustly benchmarked for both breadth and rigour against qualifications offered beyond Wales. **Again we recommend that the legislation should include international benchmarking and regular reporting to the Assembly of this particular Award.**

Tailored progression beyond 16 and beyond 18 is not a positive feature for too many young people in the current system. The Review has carefully

mapped progression potential into adult life and we feel that this should be included in the legislation and the reporting requirements that flow from it.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

The current system caters for a much wider spectrum of learners than was the case 30 years ago. In that sense, complexity can be seen to have served a purpose. Recent proposals in England have the great potential to narrow inclusivity and it is right that we now frame a system that is better suited to our needs in Wales.

However we feel that a single body should not necessarily mean a single award in each subject area. The new body can reduce complexity and strengthen accountability without reducing its offer to a 'take-it-or leave it' minimum. We urge the Government not to include the concept of the single award in each subject within the legislation .

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

NAHT Cymru strongly supports the Government's vision for Qualifications Wales. This is a significant step in the development of devolved government. It will challenge government, providers and stakeholders but we sense an uncommon degree of consensus around the Government's determination to do things better for young people in Wales and the employers, colleges and universities that they will take them on the next step to employment and fulfilment.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

We believe that the Government has set out a very measured and appropriate path to a better qualifications system for Wales. The Government recognises that it must:

- Support and engage with stakeholders;
- Strengthen public confidence in, and information about, qualifications in Wales; and
- Supply high quality qualifications to learners in Wales.

The vision will be achieved if the Government gets these workstreams right and properly resource them. Careful thought and consultation needs to be given to the global funding of the current system to see how existing resources can be better utilised. Since we suspect that this might impact on the allocation or distribution of funds flowing to schools we would urge the government to consult deeply with practitioners about the cost of examination entries and the provision of training, replacement classroom teaching to allow training, and the costs of benchmarked vocational courses.

We strongly support the Government's present intentions and wide consultation in and beyond Wales in order to disseminate the vision and boost public confidence.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

The Government rightly intends to create an independent regulator. The legislation should ensure that the new body is indeed encased in a legislative shell that anxious Ministers will be unable to penetrate through reserved, regulatory or remit powers. We do not underestimate the difficulty of achieving this whilst still maintaining the strong collaborative dialogue between government and the new body that is set out in the diagram in section 5.3.

In particular we believe that the degree of 'independence' will rest on the nature and accountability of the Minister's powers of remit. In a small country it is essential that people know what they can and can't do and that headline legislation does what it says on the tin. We welcome the bravery of

the Minister in devolving his powers in the ways set out here and commend him for it **so long as we can be assured that the nature and scope of the remit will itself be subject to regular and full scrutiny by the Assembly.**

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

We believe that the present proposals are the result of an appropriate and wide consultation and that they reflect the consensus around what needs to be done.

They are ‘about right’ subject to our comments in Q5 above about the nature of the remit and its fitness for purpose going forward. Consensus in such high-stakes areas is not a persistent feature of the last 40 years in England and Wales. As indicated above we welcome and support the commitment to an inclusive system contained in sections 5.14 and 5.15

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

Publish an Annual Report in detail for the needs of the Assembly in carrying out full scrutiny and in various means that will ensure full public accessibility.

Benchmark its qualifications against those offered in England, Wales and Scotland and against European Vocational Education benchmarks.

Since PISA testing of 15 year-olds is a feature of international benchmarking and the Government’s priorities, QW should ensure that its Qualifications support the development of skills and knowledge that are tested within this framework. If the OECD benchmark moves in future to a different framework, QW should be obliged to re-align its provision. We accept that this might be done through the remit.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

These proposals will have high impact on learners and providers. This is a high-stakes development but we are persuaded that the Government has carefully planned its development and has begun to address the various barriers to success.

Learner and parental engagement and 'sign-up' are essential to success. There will be costs to securing this.

Workload for school leaders and teachers will be greatly increased. This might be mitigated by decisions taken within the curriculum review. We simply urge that this is a time for getting priorities right. Schools cannot be expected to cope with heavy and constant change at both KS3 and 14-19. The writing of schemes of work, means of assessment and preparation for examinations are the meat and drink of every teachers trade in secondary schooling. Change of this kind is always challenging and high stakes change carried out at speed is especially challenging. Something has to give and we suspect it is in the degree of regulation, assessment and prescription in KS3.

If the workload issue is not addressed early and appropriately across the current Government workstreams, these proposals will fail because ultimately it relies on teachers capacity to deliver what QW determines is right and teachers themselves have a huge influence on learner and public opinion.

Question 9 – 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.

Young people are supported in making choices about Qualifications by the activities of Careers Wales and the regulatory Guidance of the *Careers and the World of Work Framework*.

If there is to be less choice at 14 it is essential that schools fully provide all those curriculum and other experiences that allow young people to make informed choices at 14. This should not be lost sight of during the Curriculum Review also being undertaken by the Minister.

We also commend the emerging notion that, for most young people, choice at 14 is not about individual subject choice but about the kind of pathway that is most appropriate for them in finding success and ensuring progression. We believe that there is complementary work to be done in KS3 in freeing up time

to allow individual pathways to be more carefully tailored and planned prior to Y9 and commend the work being done by Caerphilly County Borough Council and the SEWEAS as good practice in this regard.

Similarly there is more work to be done in amending the Learning and Skills Act to reflect the developments set out here.

Whilst these are not specifically relevant to the present consultation we urge the Government to maintain its present stated intention of working holistically over several programme areas so that there is some joined-up policy presented to schools and other providers.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: Andrew Gladstone-Heighton

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Responses should be returned by **20 December 2013** to:

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Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

A barrier in the proposed new system is the differences in the skills systems of the nations of the United Kingdom. This will have an impact on learner's mobility and career progression if they are moving between these nations. It may also affect equality of access to Higher Education in comparison to Scottish and English learners.

Will Qualifications Wales be the gatekeepers of this transferability of skills between nations?

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

We believe that the recognition of quality qualifications produced by Awarding Organisations supports learner and institutions choice, as well as supporting industry to provide provision in response to their skills needs.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

We agree with the need for a centralised body to quality assure qualifications offered in Wales. However, we feel that Awarding Organisations are best equipped to use their expertise facilitating development of qualifications for delivery in Wales.

A model where Awarding Organisations work in partnership with Qualifications Wales to offer relevant vocational qualifications (as in Scotland) would best combine Awarding Organisation expertise with the Welsh government's input for targeting specific and emerging skills needs in the nation.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Awarding Organisations review and evaluate their provision on an on-going basis in accordance with their own business operations. Qualifications Wales could co-ordinate with Awarding Organisations with this already established process to identify which qualifications are no longer fit for purpose for a certain sector, or to provide input for occupational sectors.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

We've concerns that we may have a situation where Awarding Organisations are working towards different regulations, and working towards Ofqual's and Qualifications Wales different approaches may mean additional bureaucracy without benefit to the learner.

We also would like clarified how Qualifications Wales will regulate itself? Will it follow a similar model to the Scottish Qualifications Authority (SQA) and Council for the Curriculum, Examinations & Assessment (CCEA)?

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

How would Qualifications Wales be monitored to ensure the qualifications that it offers are of sufficient quality and rigour, and are fit for purpose? This function is fulfilled for Awarding Organisations by Ofqual, would a similar Office exist for Qualifications Wales' developed products?

More widely, would having Qualification Wales as the only Awarding Organisation operating within Wales restrict learner and institution's choice of which qualification they would like to use?

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

Qualification Wales should set out a consistent and long term strategy for the Qualifications and skills system of Wales beyond party political influence.

Education and skills strategies constantly change and are influenced by political ideology, and this means that qualifications have to change too, not allowing them to bed in, undermining public confidence.

A period of stability to allow any change to bed in would allow the medium to long term effectiveness of qualifications to be evaluated.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

The proposals as they stand would have an impact on our ability to offer meaningful qualifications to benefit learners in Wales. Institutions would also not have the range of provision to choose from, restricting learner choice.

Stakeholders and employers engaging with the Skills and Education system would have to understand new types of qualification, and would be unable to request the specific qualifications for entry within their sectors. This could restrict their ability to recruit learners.

Question 9 – 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.

Although not specifically the remit of the Welsh Government, has consideration been given to the transferability of qualifications to learners who wish to move into or out of the nation?

There are significant differences emerging in the education and skills policies across Wales, Scotland, England and Northern Ireland, and this will have an impact on learner's mobility and career progression if they are moving between these nations.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: [Jeff Protheroe](#)

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e-mail/telephone number: jeff.protheroe@ntfw.org / 029 2049 5861

Your address: [Ocean Park House, East Tyndall Street, Cardiff CF24 5ET](#)

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

In its response to the Review of Qualifications for 14-19 year olds in Wales consultation, NTfW wholeheartedly welcomed the move to initial vocational education and training (IVET) qualifications and continuing education and vocational (CVET) qualifications. However, it is felt by NTfW that there is an extremely low level of understanding of IVET / CVET qualifications amongst not only 'wider stakeholders' i.e. parents, employers etc., but more importantly (and worryingly) amongst key Information, Advice and Guidance (IAG) practitioners as well.

Furthermore, there is a lack of understanding between the various sectors (particularly between the pre-16 and post-16 sectors) about the various qualifications, transitions and progression. Similarly, there is also a lack of clarity amongst IAG practitioners about the various programmes, and the transition between them.

Within the context of Work-based Learning (WBL) many providers work across (geographical) borders. One of the issues faced by providers with this is the lack of 'portability' of qualifications across these borders. Similarly, as most WBL work with school leavers, there are also issues of 'portability' between qualification systems i.e. there are no 'proxy qualifications' for Essential Skills Wales (ESW) qualifications. This creates the situation, where the learner feels that they are doing the same qualification twice.

There is a considerable number of duplication (of content) across qualifications.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

NTfW recognises Qualifications Wales was born out of the recommendations in the Review of Qualifications 14-19, and as such much of the (immediate) scope of the emerging organisation lays in the area of general qualifications (GQs) and the work of 5 awarding bodies. However, as recognised in the consultation document "*over 120 further awarding bodies (...) mainly award vocational qualifications (VQs)*" With this in mind, NTfW would like to see the choice of 'awarding body' to stay with the provider. One of the key benefits of this is ensuring that established systems are maintained, but it is felt that no one 'awarding body' could offer the broad spectrum of specialisms required to work across the various sectors.

It is also felt that there is a danger of losing credibility with employers and learners if trusted 'brands' such as City and Guilds, BTEC etc. disappear, as it is felt these offers a 'currency' to those using qualifications. Furthermore, a considerable amount of resource (time, money and effort) has been committed over the years, to develop the recognition and awareness of these 'brands' with wider stakeholders e.g. parents, employers etc.

NTfW feels that there is a risk to how we ensure that awarding bodies continue to invest in the development of qualifications for Wales, which are specific to Wales?

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

NTfW fully embraces the vision set out for Qualifications Wales. However, we would welcome an increased role for Qualifications Wales as the 'gatekeeper' for Apprenticeships in Wales, which utilises the Sector Advisory Panels.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

NTfW urges Qualifications Wales to link its work with other key stakeholder bodies within the education and training landscape in Wales, most notably, the General Teaching Council for Wales (GTCW) and its successor, as well as Estyn.

We need to ensure that when Qualification Wales develops new GQs, that portability is inherently built in, to ensure that there are linkages to Essential Skills Wales (ESW) qualification, particularly in light of the development of GCSEs in Literacy and Numeracy.

NTfW notes that part of the vision for Qualifications Wales is to 'strengthen public confidence in, and information about, qualifications in Wales.' We also note that as part of Qualifications Wales' functions and activities that it will play is role in ensuring 'fitness of purpose' for all of the qualifications it is responsible for. Increasingly, "*employers are shouting about the importance of employability and life/work skills*" and NTfW urges Qualifications Wales to ensure that all qualifications are scrutinised (as part of the quality assurance process) to ensure they offer the 'employability' skills required by the intended user i.e. the employer.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

NTfW welcomes the fact the regulation will be independent of government, but that accountability will be maintained to the National Assembly for Wales (NAW)

It is felt that Qualifications Wales' Annual Report should link to other key reports about the education and training sector, most notably, Estyn's Chief Inspector's Annual Report

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

NTfW would welcome the opportunity for Qualifications Wales to become the 'gatekeeper' for Apprenticeships in Wales, alongside its role as the 'gatekeeper' for all vocational (and skills) qualifications.

Furthermore, NTfW feels that Qualifications Wales should ensure that all provision is available bilingually and/or through the medium of Welsh.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

There is some confusion about the Credit and Qualifications Framework for Wales (CQFW) and what role it will play moving forwards. This is particularly the case in relation to funding, when all post-16 provision is moving to a model where provision is based on programmes. Who is the CQFW aimed at?

One of the key ways that Qualification Wales can raise public confidence is through demonstrating (regularly) the 'distance travelled' by the organisation. Furthermore, Qualification Wales needs to clearly outline (very early on) where Wales is going in relation to the education and skills agenda i.e. by explaining that we are following the European model.

Linked to the point above, it is felt that Qualifications Wales should have a long term strategy that will sustain the changes and improvements to the qualifications system in Wales, and make the system clearer for all stakeholders, fully taking into consideration the challenges in the longer term, as well as the short to medium term.

NTfW would welcome clear 'road maps' outlining the route(s) offered by different qualifications. This is particularly important when outlining the key differences between IVET and CVET qualifications.

NTfW believes that Qualifications Wales should become the single source of information for all (less HE) qualifications in Wales. However, it is vitally important that any Communication Strategy has the flexibility to ensure that the messages are targeted towards the intended audience, be that practitioners, parents, (potential) learners and/or employers.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

Within the context of WBL, it is felt that there is quite a significant impact on those providers who work across (geographical) borders. This is particularly the case when providers will need to explain (increasingly) diverging qualifications systems that are as yet 'untested.'

NTfW strongly believes that there are some positive impacts going forward if all school leavers are literate and numerate at level 2 (in the light of the emerging GCSEs in Literacy and Numeracy). However, it is important to ensure that the 'recognition' of these qualifications (and inherent skill) into post-16 qualifications, such as ESW, is a simple process.

However, there could be some potentially serious impacts if some awarding bodies decide not to engage with Wales and withdraw their offer. It is felt that a considerable amount of time, money and effort would be needed to establish new relationships with those awarding bodies that are left.

Question 9 – 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.

Within the context of WBL, particularly in the design and delivery of future Apprenticeships, a considerable amount of change is proposed, which could see a great deal of divergence between England and Wales. With this in mind, Qualifications Wales is urged to keep a close eye on developments, and ensure that any potential negative impacts are minimised.

NTfW would welcome (strongly) an increasing role for Qualifications Wales in the area of Apprenticeships, and would particularly welcome Qualifications Wales becoming the 'Issuing Authority' for Apprenticeship Frameworks in Wales.

It is noted from the Consultation Document that "*there is some debate about the future of NOS*" With this in mind, there is an important role to be played in

the coordination of the Sector Panels in Wales to ensure that any qualifications that are developed (for Wales) are 'fit for purpose.'

By ensuring the two things listed above are done, this would ensure the quality of the Apprenticeship Frameworks in Wales, and the quality of the qualifications within them.

Furthermore, NTfW would strongly welcome a situation where the emerging GCSEs in Literacy and Numeracy are able to be recognised as 'Proxy' qualifications against ESW Qualifications. It is felt that this would serve both the learner (not having to complete a similar qualification twice, as well as the public purse, as you are not having to fund a qualification twice).

In our response to question 1 of this consultation, we raised our concerns about the 'portability' of qualifications across (geographical) borders. Many WBL providers based in Wales (both indigenous and multi-nationals) deliver to UK-wide companies who are operating in Wales, as well as Welsh companies who operate across the UK. With this in mind, NTfW would urge Qualifications Wales to have continual dialogue with other 'regulatory' bodies across the UK when developing VQs, particularly in relation to the content of the qualification i.e. the knowledge, understanding and skills that are looking to be developed. However, we recognise that there may be additional content required, based on the needs of Welsh employers, but we should not be in a situation where our VQs are seen to be of less value to those who use them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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NUS Wales response to 'Our qualifications - our future'

Overview

The National Union of Students (NUS) Wales welcomes the opportunity to respond to the Welsh Government's 'Our qualifications – our future' consultation. NUS Wales is a confederation of students' unions representing more than 300,000 students in the nation. As the only representative voice for students in Wales, NUS Wales represents students from all affiliated students' unions in both HE and FE sectors, this includes 8 HE institutions and all Welsh FE Colleges.

NUS Wales exists to promote, defend and extend the rights of students and develop and champion strong students' unions. We fight barriers to education; empower students to shape both a quality learning experience and the world around them; as well as supporting influential, democratic and well-resourced students' unions.

As well as campaigning on behalf of our members, NUS Wales provides a range of training to students' unions including training for full-time offices, part-time officers and staff. We provide support to students' unions to ensure they are able to engage positively with the latest policy developments that affect them.

We provide resources and staff support to students' unions to help strengthen them and enable them to become ever-more effective in their operation. We work with partners across Wales including DfES, HEFCW, HEA and QAA to develop efficient and productive representation structures for students.

In further education, NUS Wales has engaged and trained student governors in every single Welsh FE College and trained class representatives from the majority of FE Colleges. Furthermore, we are developing a National Society of Apprentices to provide representation for those who study in this setting; this endeavour has the backing of the Welsh Government.

The core values of NUS Wales are democracy, equality and collectivism. We believe that student organisations should be student-led and that education is a benefit to the individual and to society.

Key Principles

We believe in a flexible system of qualifications that recognises the differences between learners and allows for a parity of esteem between vocational education and more traditionally academic routes. We feel such a system would enable movement between different kinds of learning and would be supported by meaningful engagement with stakeholders including students and businesses.

As such we have welcomed, and will continue to welcome, the divergence of Welsh education policy from the approach currently being adopted by the Westminster Government, around such areas of the decoupling of AS/A-Levels and terminal assessment, which looks to limit choice and flexibility in 14-19 qualifications.

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Wales is, relatively speaking, small in terms of further education institutions and student numbers. As such the way in which a number exam boards compete with subject specifications and awards that are often quite different to one another, can make training the workforce to a consistent standard difficult. Similarly, a large number of different qualifications can be very confusing to students, for example when seeking advice and guidance related to their course content or choosing courses from different providers.

We believe a potential weakness of the current system is the Welsh Government's current role as the regulator of qualifications in Wales, and so we welcome the proposal to make an independent organisation the regulator of qualifications in Wales. This will help ensure that students are not used for political ends and will inspire confidence in decisions made affecting students in Wales.

We also feel that a weakness of the current system is the lack of quality enhancement/improvement in Welsh 14-19 qualifications. This is of a distinct contrast to the position in higher education in Wales where quality enhancement, in addition to quality assurance, has been one of the principal focuses of recent years.

Question 2 – Are there any specific features in the current system that you would like to see retained?

We feel it is important to where possible retain the three-country brands of A-levels and GCSEs, as well as the underpinning philosophy behind these qualifications. This helps ensure portability of the qualifications across the UK and beyond. We recognise that with policy diverging unilaterally in England, this may become increasingly problematic, but where this is the case we would welcome further work with Northern Ireland and, where appropriate, Scotland to align our qualifications.

In terms of the qualifications themselves, we feel strongly that non-terminal assessment and the coupling of AS and A-levels should be retained. Terminal assessment would be a retrograde step that does not recognise the multiplicity of learners and, importantly, does not recognise and reward the skills we want to develop in students in Wales.

Similarly, we advocate a flexible qualifications system with scalable qualifications. Decoupling the AS and A-levels ultimately places a greater importance on decisions made by students when first entering post-16 education, and is essentially unforgiving of mistakes or changes of mind.

We also would fully support retaining and strengthening the Credit and Qualifications Framework for Wales. The CQFW, alongside current proposals centred around the Welsh Baccalaureate, help promote parity of esteem between general qualifications and vocational qualifications.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

We broadly support the proposed vision for Qualifications Wales.

We feel it is appropriate that decisions such as grading are able to be made separate of the Welsh Government and support a simplified, professional approach to qualifications in Wales

We strongly believe that engaging with stakeholders is vitally important, particularly the single most important stakeholder of qualifications in Wales – students. To most effectively engage with students in Wales, it is fundamental that the engagement take place through recognised representative bodies including students' unions in colleges and universities locally and NUS Wales nationally.

Similarly we feel that it is important that employers are fully engaged by Qualifications Wales. If we want our qualifications system to be skills-based, and not constructed around a linear pathway from GCSE to university, then employers must be engaged not only in the design and implementation of vocational qualifications but equally with general qualifications.

We welcome the move to quality enhancement through having a clear focus on awarding bodies reviewing and self-evaluating in order to improve qualifications, although the ways in which this agenda will be moved forward must be further detailed, transparent and accessible.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

We believe that, delivered effectively, the move to a smaller number of qualifications, with Qualifications Wales acting as gatekeeper, would achieve the aim of offering a simplified qualifications system.

The consultation document describes the vision as including both the scrutiny, evaluation and improvement of qualifications as well as the supply of high quality qualifications. Currently we do not feel there is enough information provided around the activities that Qualifications Wales would carry out to determine where the activities would achieve this.

An element of this uncertainty rests on our concerns regarding how Qualifications Wales will function as both regulator and, ultimately, the principal awarding body in Wales. We feel that there would be a potential conflict of interest between these two functions. We recognise this is touched upon in 5.44 to 5.48, particularly in terms of using comparable data and external scrutiny.

However, we do not believe sufficient detail has been provided regarding how Qualifications Wales will be structured to minimise the risk presented by this conflict of interest, including lines of reporting. It is vital that these functions be delivered in a discrete manner to inspire confidence in the sector, the public or stakeholders.

As such, we hope there will be further and more detailed consultation in regards to the Qualifications, Curriculum and Assessment (Wales) Bill.

To achieve vision of supporting and engaging with stakeholders, we do not feel there has been a sufficient enough outline of how students, and the representative bodies of students in Wales, will be engaged. We feel the consultation document fails to recognise the importance of students and learners as stakeholders.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

We both welcome and agree with the proposal to establish Qualifications Wales as an independent statutory corporation with public appointments made according to the Nolan principles.

We believe that it is imperative that there be student representation on the proposed board of Qualifications Wales. The same model is used to much success in other arms-length independent bodies. This includes: HEFCW where the NUS Wales President is an observer on the council, QAA Wales Committee on which the NUS Wales President sits, and QAA (UK) board of which the NUS VP for Higher Education is a member.

There are 190,000 further education students in Wales who are members of NUS Wales. It is these students that will be directly impacted by the proposed establishment of Qualifications Wales and so it is vital that their views be fully represented.

We also feel there needs to be a clearer reporting and accountability process detailed given the potential conflict of interest between the proposed awarding and regulatory functions of Qualifications Wales.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

We agree with the scope and functions related to quality improvement, oversight of qualifications and the gatekeeping function as outlined in 5.7. We think it's important that there is a greater emphasis placed on quality improvement and the gatekeeping of qualifications in Wales. The sheer number of qualifications available to 14-19 year old learners in recent years have been vast, complicated and at points of an uncertain or questionable standard.

Regarding the provision of information related to qualifications – we would be keen to understand in what ways Qualifications Wales' provision of information would relate to work carried out by Careers Wales, particularly in schools.

As we have mentioned previously, we have concerns regarding the Qualifications Wales' proposed awarding function – especially when the body would be assuring and gatekeeping qualifications that may be competing with its own 'products'.

We would also welcome further clarification on how it would be ensured that Qualifications Wales review and evaluate their own qualifications to the same extent that they would expect of other awarding bodies. For example, 5.25 outlines how Qualifications Wales will have the powers to fine, direct and recover costs from awarding bodies, yet there is not sufficient detail on how they will, essentially, regulate themselves.

We welcome a move to qualifications in Wales reflecting the needs of Wales, but we must at the same time be wary of an isolationist approach with curriculum and qualification content. As such, we support the continued promotion of Curriculum Cymreig and Education for Sustainable Development and Global Citizenship in the curriculum. We also greatly welcome the recognition that there is room for improvement in the delivery of Welsh-medium qualifications, it is our understanding that the area of 16-18 education is where Welsh-medium learners are most poorly served in terms of provision and qualifications.

As outlined in 5.18, we welcome and fully support a partnership approach to qualifications in Wales but it must ensure that a partnership approach includes students and employers as full partners.

We also welcome the development of a system of peer review with Northern Ireland and Scotland. We feel a system of peer review would help inspire public confidence in Welsh qualifications and promote an understanding of Welsh qualifications among employers and higher education institutions across the UK. As such, we feel the development of a system of peer review should be prioritised as soon as it is feasibly possible to do so in the timeframes associated with Qualifications Wales.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

The role of Qualifications Wales as both regulator and awarding body could place public confidence of qualifications in Wales at risk. As such, we would suggest an emphasis upon clarity, timely information and absolute transparency regarding the governance and accountability structures of Qualifications Wales.

We also feel it is important to recognise the impact that utilising the learner voice in further education would have upon public confidence. We should ensure that there are strong students' unions in further education and good representation structures for students. This would make it much easier to quickly and effectively disseminate information relating to qualifications and changes to qualifications to students and, by extension, their parents.

We would also like to see greater engagement with employers in regards to general qualifications, including smaller businesses as well as blue chip companies.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

These proposals will impact our current and future membership greatly – both those currently studying in further education, those who will progress onto higher education and those who will commence a further education course in the near future. The impact will likely span a number of areas including:

- The provision of information and selection of courses
- Entrance to higher education and employment as a result of either increasingly positive or negative perceptions of Welsh qualifications
- The 'classroom' experience of education as a result of changes to qualifications, course content and structure

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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For further information regarding NUS Wales response to the 'Our qualifications – our future' consultation please contact:

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Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: **Paul Steer**

Organisation (if applicable): **OCR**

e-mail/telephone number: paul.steer@ocr.org.uk

Your address: OCR, 1 Hills Road, Cambridge, CB1
2EU

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

In setting out the case for change, the consultation identifies a number of 'barriers to effectiveness' that we would not accept or consider to be insurmountable.

The rationale for creating one national body to deliver the 'assessment of the main qualifications in schools' ignores the evidence of the successful operation of established awarding processes to address this issue. There is strong evidence that these joint awarding body processes have successfully delivered comparable standards for many years.

Contrary to the view implicit in the consultation, we would argue that the creation of a single exam board will not inherently protect standards over time or between qualifications or address in any way the main causes of grade inflation. Indeed, we believe it would weaken rather than strengthen the capacity of the system to maintain standards.

We also believe that the creation of a single exam board in Wales risks increasing costs to the tax payer, creating new bureaucracies, and removing incentives for efficiency and innovation.

We do, however, recognise the Welsh Assembly's intention is to create a qualification system in Wales that is responsive to its own policies and independent from policy decisions taken by the Department for Education in England. This desire to achieve an independent examination system for Wales is wholly a matter for the Assembly and the people of Wales, but we believe that the consultation could have been more explicit about the risks of such a development for learners in Wales and, indeed, in other parts of the UK. The creation of qualifications solely for Wales will result in issues of comparability and transferability, and may potentially limit the variety and breadth of offer available.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

We believe that the current system provides the necessary conditions to ensure that efficiency and innovation remain at the heart of the process. Competition makes sure that there are strong incentives to drive out unnecessary costs and secure investment in innovation.

The loss of competition between awarding bodies will also have a direct impact on choice. The current system offers schools and teachers the ability to choose between a range of options to create a learning programme that fits with the aspirations and interests of their pupils. More thought needs to be given as to how and when it would be appropriate for schools to seek alternative qualifications where they believe those provided by Qualifications Wales are not appropriate and/or

whether Qualifications Wales is planning to commit to providing the full breadth of qualifications that will be needed.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

(1) Regulation and safeguarding standards

We fundamentally disagree with the vision to combine the design, development and delivery of qualifications, with the regulation of these qualifications. This creates a conflict of interest which will not work in the interest of maintaining standards, protecting the learner or strengthening public confidence in the system.

We applaud the decision to provide Qualifications Wales with independence from Welsh Government, but we would use the same argument to support a separation of responsibilities between the function of developing and awarding qualifications and the regulation of this activity. This will ensure that the regulator is able to take decisions 'free from undue influence'.

(2) Diversity and transportability

The decision to propose that Qualifications Wales should develop and award most general qualifications for learners 14 -16 will inevitably impact upon the capacity of other awarding bodies to operate within Wales. There is a risk as already stated that the current diversity of offer available to learners will diminish.

The vision set out in paragraph 4.12 sees this extending into provision for 16-19 learners where again there may be a direct risk of reducing the diversity of offer available to learners in Wales.

Consideration alongside proposals from England of whether GCSEs and GCEs should be reformed, raises the question of comparability of outcome that needs to be addressed to ensure Welsh learners are not disadvantaged by the proposals

(3) Clarity of vision

We would wish to see more attention given within the consultation of how the emerging difference between GCSEs and GCEs will be managed in a way to protect the long term progression interests of learners in all parts of the UK.

The lack of a clear timeline for when all of the proposed changes will be achieved means that the vision has the potential to damage current arrangements before the revised processes are in place. The suggestions that the full breadth of the changes will take place 'in due course' obscures both the scope of the proposed changes and the amount of work that is required to deliver the vision successfully.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

(1) Regulatory activities and functions

The proposed 'regulatory' activities and functions are in line with the existing requirements that govern awarding body activity. As OCR has long argued for these powers to be moved from Welsh government, we are in support of the direction of travel.

Despite this support, we see within the proposals, the potential for growing divergence between Wales and England – not only in terms of qualification design but regulatory requirements, placing greater bureaucratic demands on those awarding bodies wishing to continue to provide qualifications to learners in both England and Wales. Whilst not the subject of this consultation there is a need for an explicit memorandum of understanding between Qualification Wales and Ofqual to agree core areas of regulation to avoid unnecessary duplication, confusion and unduly burdensome regulation.

We note with concern the current wording of paragraph 5.26 – suggesting as it does that Qualification Wales, in undertaking its quality assurance work, may seek to charge for what should be deemed delivery of its regulatory function.

(2) Awarding activities and functions

As stated previously we are opposed to the same body undertaking qualification design, delivery and awarding; the inherent conflict of interest puts at risk the maintenance of standards and the operation of a healthy diverse market.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

We welcome the proposal to create an independent regulator directly answerable to National Assembly Wales.

We are however concerned about the current wording of paragraph 5.4. Whilst agreeing that the Minister for Education is responsible for setting policy and defining remit, we would wish to see greater emphasis on the regulator's ability to provide public advice to the Minister, particularly if there are risks to standards emerging from policy proposals and resulting implementation timetables.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

Our earlier responses address any comments we would have made in response to this question.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

- (1) Concentrate upon the delivery of the first clause of Recommendation 5 – regulation and quality assurance – providing the public with evidence of the ability to act as a trusted independent body with powers to ensure the required standards are delivered throughout the system.
- (2) Set out the timeline to review and report ‘without prejudice’ on the viability of undertaking the proposed additional powers to award qualifications addressing the potential impact upon ability to deliver independent regulation on behalf of Welsh government.
- (3) Keep a view of and report on the comparative value of emerging Welsh qualifications against international comparators and provide the Welsh Assembly with advice on how to address any emerging negative trends in terms of outcome for learners.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

- (1) **Provision of GCSEs and GCEs**

- The different models for GCSE and GCE that will emerge from 2015 onwards suggest that OCR will have to review the range and scope of provision offered to Welsh learners and centres.
- Whilst this is already recognised in respect of GCSEs, our initial view in respect of the impact of the changes to A Levels is that it will not be possible to deliver a single assessment instrument that meets the needs of both the Welsh and English markets. This is because assessments for Wales would be at AS and A2 standard, whilst those for England would be at A Level standard. If further investigation identifies a way of addressing the assessment requirements, there would still be additional operational costs involved in operating two different awarding processes.
- The intention to move all core/large volume subjects under the umbrella of Qualification Wales would mitigate against investment costs required to deliver the current breadth of offer as Wales-only entry would not be large enough to cover costs incurred.

(2) Vocational Qualifications

- Whilst welcoming the decision to maintain an open and competitive market in this area, the ongoing reform agenda poses some as yet unanswered questions:
 - Will Qualification Wales implement or mirror changes proposed by the recent Richards/Whitehead review? If not, a divergent set of qualifications will inevitably emerge to mirror those already noted in respect of general qualifications.
 - The proposed processes for reviewing and agreeing vocational qualifications in Wales have the potential to lead to different requirements emerging, thus increasing the cost of development.
 - The plan that all key qualifications for young people will eventually be delivered by Qualification Wales limits the potential for awarding bodies to create and sustain the necessary network of stakeholders to maintain a credible vocational offer within Wales

(3) Diverging regulatory agenda?

There is a risk that with the creation of Qualification Wales a divergent approach to regulation emerges in line with the existing Scottish model. Whilst this may be the inevitable/desired outcome of Welsh Government, from an awarding body perspective, this will build in cost and risk in terms of ensuring compliance.

Question 9 – 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.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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Response sent to:
qualificationswales@wales.gsi.gov.uk
19 December 2013

Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Consultation response form

Your name: Welsh Language Commissioner

Organisation (if applicable): Welsh Language
Commissioner

e-mail/telephone number:

post@comisiynyddygymraeg.org / 0845 6033221

Your address: 5-7 Heol Eglwys Fair, Caerydd CF10
1AT

Responses should be returned by **20 December 2013** to:

Claire Habberfield
Legislation Team
Corporate Services Division
Department for Education and Skills
Welsh Government
Freepost NAT 8910
Cathays Park
Cardiff
CF10 3NQ

or completed electronically and send to:

e-mail: qualificationswales@wales.gsi.gov.uk

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

The Commissioner welcomes the Welsh Government's desire to simplify the regulation process and ensure greater consistency with regard to the quality of qualifications in Wales. The lack of Welsh medium qualifications and education resources is recognised as one of the main barriers to the development of Welsh medium education, particularly within vocational areas. This is made clear in the Welsh Government's summary of responses to the consultation on the Review of Qualifications for 14-19 year-olds in Wales. Establishing a new system will provide an opportunity to scrutinise and review Welsh medium qualifications in Wales, setting a direction with far-reaching objectives to develop a range of high-quality Welsh medium qualifications that meet the growing demand for Welsh medium provision amongst providers in Wales.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

We believe that moving away from a competitive market will guarantee greater consistency across the sector. However, it should be noted that a small percentage of awarding bodies already provide qualifications in Wales and have been making good progress in developing bilingual and Welsh medium provision over the years. In moving towards being the only provider in Wales for some qualifications, there is a need to ensure that current Welsh medium provision is maintained and developed further.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

Until recently, decisions regarding qualifications have been made jointly with England and Northern Ireland. We welcome the fact that the proposed changes gives Wales an opportunity to develop a qualification system tailored specifically to meet the cultural, economic and linguistic needs of Wales. To this end, therefore, we wish to see a reference to the Welsh language and Welsh medium qualifications in Qualification Wales' vision found in paragraph 1.2.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

The Welsh Government's Welsh Medium Education Strategy sets out a strategic direction for the development of Welsh medium education in Wales. The document places a duty on the Welsh Government to collaborate with other partners and agencies to fulfil the six strategic aims. In transferring duties to Qualifications Wales, full consideration will need to be given to the Strategy's aims and objectives, ensuring that the re-organisation does not hinder any plans that are currently in place and that any new arrangements facilitate the implementation of the Strategy.

When scrutinising the suitability of qualifications, the degree to which the qualifications serve their purpose will need to be considered alongside the Strategy's aims and objectives. Qualifications Wales will have an important key role to play in implementing Strategic Aim 5: *To improve the central support mechanisms for Welsh-medium education and training*, which outlines the need to develop the range, number and availability of Welsh medium qualifications, along with the supporting teaching resources. It also notes the need to standardise contemporary Welsh terminology for Welsh medium education provision.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

No comment

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

It is vitally important that the Qualification, Curriculum and Assessment (Wales) Bill clearly states the exact duties of Qualifications Wales in terms of developing bilingual and Welsh medium qualifications and resources as well as its powers as a regulator. Welsh Ministers currently have statutory powers to impose a fine or present guidance to any awarding body identified to be breaching accreditation conditions. Qualifications Wales will be expected to exercise the same powers as a regulator, and the specific requirements placed on awarding bodies should include the need to develop and provide qualifications and any supporting resources bilingually or through the medium of Welsh.

The Welsh Government will continue to be responsible for funding decisions, based on advice from Qualifications Wales. The Government's grant system for developing

Welsh medium qualifications prioritises qualifications that are most relevant in terms of Wales' economic needs. We note that the language medium of qualifications is not included in paragraph 5.21 as a type of information which the awarding body will be expected to report upon. We trust that the language medium is one of the factors that Qualifications Wales will consider when making decisions with regard to funding a qualification.

The nature of the collaborative relationship between Qualifications Wales and the Welsh Government will be vitally important. The Welsh Government will provide remit letters noting Qualifications Wales's main responsibilities. In order to ensure that high status is given to matters regarding Welsh medium educational provision, the letters will need to include a specific reference to that. As a result, when presenting their annual report to the National Assembly for Wales, Qualifications Wales will be expected to report specifically on developments in Welsh medium qualifications provision. The act that will establish this new body will also provide powers to Qualifications Wales to advise the Welsh Government. Qualifications Wales will therefore need to foster and develop expertise in Welsh medium education and qualifications in order to offer advice and guidance to the Welsh Government on this matter.

In terms of funding arrangements, the degree to which the Government and / or Qualifications Wales will allocate funding and ensure adequate investment for the translation of qualifications or to develop Welsh medium and bilingual qualifications will need to be made clear.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

There are several references in the consultation document to gaining the public's confidence in Welsh qualifications by ensuring that they are equal in terms of quality and status to the rest of Europe and the world. Anecdotal evidence suggests that there continues to be some uncertainty amongst the public with regard to Welsh medium qualifications. Qualifications Wales should respond to these concerns in order to assure learners and providers that Welsh medium qualifications are equal to and just as transferable as English qualifications. When providing information on qualifications to the public, we trust that Qualifications Wales will promote the value and benefits of studying through the medium of Welsh in accordance with strategic aim 5.4 of the Welsh Medium Education Strategy. The Welsh Government and Ofqual websites currently provide a list of those qualifications which can be studied through the medium of Welsh. We trust that Qualifications Wales will also gather and share information on Welsh medium qualifications. The information provided should be up to date, clear and accessible to readers as well as draw attention to progression routes available through the medium of Welsh.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

No comment

Question 9 – 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.

The final report on the Review of Qualifications for 14 to 19 year-olds in Wales states that the biggest barrier to developing qualifications is delivery problems rather than the qualifications themselves. Qualifications Wales will need to tackle the lack of Welsh medium resources and staff shortages (such as assessors and moderators) who are qualified and proficient to teach or work through the medium of Welsh.

We note that it will be necessary for awarding bodies to provide stronger evidence regarding the demand for a qualification in order to gain recognition from Qualifications Wales. It is not clear from the document to what degree Qualifications Wales themselves will be responsible for measuring the demand for qualifications and prioritising areas to develop based on the information gathered. Most of the Sector Skills Councils implement Welsh Language Schemes, and within those schemes they commit to measuring the demand for Welsh language skills within their specific sectors. Therefore, Qualifications Wales should work with the Sector Skills Councils to gather evidence on the linguistic needs of sectors and put measures in place to meet those needs.

When managing the change during the interim period there will be a need to ensure that the services provided are equal in both languages. It is expected that Qualifications Wales will be a body that will provide a fully bilingual service, including its public image and the means by which it deals with the public. It should also be ensured that any services or supporting provision offered to the public, including training, resources and guidance are available bilingually.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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**WALES
CYMRU**

RESPONSE TO:

**Our qualifications – our future
Consultation on proposals to establish a new
qualifications body for Wales**

CONSULTATION

Contact Details:

**Lisa Edwards
Temporary Political Liaison Officer
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Tondu
BRIDGEND
CF32 9BS**

**Tel: 01656 721951
E-mail: ledwards@ucu.org.uk**

1. The University and College Union (UCU Wales) represents more than 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.
2. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world: a force for educators and education that employers and government cannot ignore.
3. UCU was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators' employment and professional interests.
4. We welcome the opportunity to respond to the consultation on the proposals to establish a new qualifications body for Wales

Section 3: The case for change

Question 1 – Are there any other barriers to the effectiveness of the current system or are there any other weaknesses?

Please give your reasons for your answer and comments.

The vast number of qualifications provided by competing awarding bodies, causes confusion amongst pupils, students, parents and employers
The divergence of qualification policy between England and Wales would make continuation of the existing system of joint decision making, inappropriate.
The conflict created by Government setting and regulating policy.

Question 2 – Are there any specific features in the current system that you would like to see retained?

Please give your reasons for your answer and comments

Learner choice and portability of qualifications.

Although the wide range of qualifications on offer, can seem bewildering, care must be taken that reducing the number to a single qualification choice in each subject, does not lead to restricted choice for learners.

Who will decide the content of the curriculum? Dialogue with all stakeholders needs to remain open, in order to avoid creating a narrow and subjective range of qualifications.

Section 4: Our vision

Question 3 – What are your views on our proposed vision for Qualifications Wales?

Please give your reasons for your answer and comments.

It is agreed that a single body would improve the qualifications system in Wales. It would provide clarity and help to promote public confidence, by simplifying the current qualifications system. The focus on quality assurance is

to be welcomed, however care should be taken that a culture of 'continuous improvement' does not translate into continuous change for pupils and practitioners. The sector needs stability in which to embed and develop pedagogic approaches to support the introduction of new qualifications to ensure that they achieve the standard and status expected of them.

Section 5: How we will achieve the vision

Question 4 – What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?

Please give your reasons for your answer and comments.

We welcome the proposal that Qualifications Wales will be an independent regulator

A single body that will regulate and provide quality assurance will help to simplify the qualifications system and provide a coherent approach in supplying standardised qualifications.

The proposal that Qualifications Wales should also be an awarding body needs further consideration. There is the potential for there to be a conflict of interest, if the same body is to both regulate and award.

Whilst it is appropriate to have qualifications that are relevant to the culture and economy of Wales, care must be taken not to become too inwardly focussed on Wales and its employment needs. Whilst skills for employment are crucially important, the value of education for self fulfilment must not be overlooked.

We welcome the inclusion of Apprenticeship programmes within the Qualifications Wales scope and hope that this will afford them a more prominent and accessible position within the qualifications framework.

Question 5 – What are your views on the proposed governance arrangements for Qualifications Wales?

Please give your reasons for your answer and comments.

We note that the Board and Chief executive will be selected through a public appointment process. How will it be ensure that the board members and Chief Executive will be representative of stakeholders?

We would urge that the Board includes a significant proportion of members who have recent or current pedagogic experience. If Wales is to develop a high quality qualifications system, there must be input from those who will be required to deliver it; they have the relevant expertise required to provide appropriate advice and guidance on the practical application of any proposed new qualification structure and content.

We welcome the proposal that Qualifications Wales will be required to provide support and advice for practitioners.

Question 6 – What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit?

Please give your reasons for your answer and comments.

We welcome the proposal for a single qualifications body, which will standardise the quality of qualifications in Wales.

It is appropriate that when setting standards, the body should also act as a gatekeeper for the standards of qualifications that will be provided by other awarding bodies. This will help to ensure the quality of provision in Wales is maintained, which will help to improve public confidence and promote the value of Welsh qualifications nationally and internationally.

However, care must be taken that this does not limit subject choice for learners.

Question 7 – What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?

Please give your reasons for your answer and comments.

To help strengthen public confidence Qualifications Wales should devise a simplified and standardised range of qualifications that provide a rigorous and robust assessment of knowledge, skills and understanding.

However, Welsh qualifications must be viewed as credible on the worldwide stage, to ensure that learners can truly compete in a global market.

It should seek to promote parity between vocational and academic qualifications.

It should avoid making frequent changes to qualification structures and content and allow time for new initiatives to become embedded and polished by education professionals.

Question 8 – How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

Please give your reasons for your answer and comments.

The creation of a single qualifications body for Wales will help to eliminate the confusing array of competing qualifications and provide clearer options for pupils and students. For employers it will hopefully make recruitment processes simpler, as qualifications will be easier to compare.

The proposal to introduce the new system gradually to minimise disruption, is to be welcomed; too many simultaneous qualification changes would have a huge impact on teacher/lecturer workloads, which in turn would have a detrimental effect on the quality of delivery and on the pupil/student experience.

Overall the move to a single, independent body is regarded as a positive step forward to improving the quality of educational provision in Wales

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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