Review of qualifications for 14 to 19-years-olds in Wales

Consultation response form

Your name: Mandy James

Organisation: The City and Guilds of London Institute (City & Guilds)

e-mail: mandy.james@cityandguilds.com
telephone number: 02920 748600

Your address: 12 Lambourne Crescent, Cardiff Business Park, Llanishen, Cardiff, CF14 5GH

Responses should be returned by 1 September 2012 to:

Nia Jones
Review of Qualifications
Qualifications and Learning Division
Welsh Government
Tŷ'r Afon
Bedwas Road,
Bedwas,
Caerphilly,
CF83 8WT

or completed electronically and sent to:

reviewofquals@wales.gsi.gov.uk

<table>
<thead>
<tr>
<th>Are you a:</th>
<th>Awarding organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>(please delete as applicable)</td>
<td></td>
</tr>
<tr>
<td>Would you be prepared to take part in any follow up activity for the review (e.g focus groups)?</td>
<td>Yes</td>
</tr>
</tbody>
</table>
This response form is in two parts:

- **Part A** is aimed at all respondents. It sets out the big picture and key questions.
- **Part B** is aimed at specialists, practitioners and those with a keen interest in qualifications. It is more detailed and technical.

Please feel free to answer any questions from either part.

The following list shows questions that groups might be particularly interested in:

<table>
<thead>
<tr>
<th>Role</th>
<th>Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Learners/parents/carers</td>
<td>Part A and B3, B4.1, B4.2, B5.1, B5.2, B5.3, B5.4, B5.5, B5.7, B5.9, B5.10, B5.11, B5.13, B6.4</td>
</tr>
<tr>
<td>Learning providers</td>
<td>All questions</td>
</tr>
<tr>
<td>Employers</td>
<td>Part A and B3, B3.1, B3.2, B4.1, B4.2, B5.1, B5.4, B5.7, B6.4</td>
</tr>
<tr>
<td>Higher education practitioners</td>
<td>Part A and B3, B3.1, B3.2, B4.1, B5.4, B5.5, B6.4</td>
</tr>
<tr>
<td>Awarding organisations</td>
<td>All questions</td>
</tr>
</tbody>
</table>
Part A: For all respondents

For discussion of each issue please refer to the consultation paper. Question numbers correspond to section numbers in the consultation paper.

Question A2.1

i) Do you agree with the vision and principles set out at A2.1?

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>☒</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Not sure</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

ii) What, if anything, would you add or change?

City & Guilds believes that good vocational and technical education should play a key part in the education offer for 14-19 year olds. The disconnect between what young people have to offer and what employers require is something which City & Guilds also recently highlighted in our own research report: Ways into Work: Views of children and young people on education and employment. The report, which was the first comprehensive study of its kind on the views of 7 to 18 year olds on education and employment, revealed a well-informed generation, who are keen to engage with employers and are skilled, but lack the softer skills that make them ready for the world of employment. Among other things, the report found that young people want greater emphasis on the practical application of Maths and English in schools. This tells us that employers and young people actually want the same thing: teaching that equips the learner for the workplace and gives the right skills employers say they need to drive economic growth.

The Principles in Section A2.1 currently set out features of a qualifications system for Wales rather than a vision of what that qualification system needs to deliver. City & Guilds believes that these principles are useful but need to be set within the context of the purpose of 14 – 19 education and training in Wales as we have outlined above. We would want the Principles to include many of the original principles in Learning Pathways 14-19, expressed as “The key to our approach is “choice”. We want to move away from a one-size-fits all approach, where achieving anything other than good academic qualifications is often seen as less useful or prestigious. We want our young people to be able to choose Learning Pathways that best suit them – mixing and matching vocational, academic and occupational qualifications and experience.” Without a clear vision for qualifications and their purpose, which meet the needs of young people and the Welsh economy, qualifications will be developed to meet perceived customer needs and these will be the result of a range of different drivers such as changes in the detail of funding, shifts in university requirements and new employment opportunities. Clarity of purpose for education and training 14-19 and for qualifications would allow all concerned, including providers and awarding bodies, to develop learning programmes with associated qualifications that lead to positive progression for all young people. It is also important to recognise the differing purposes of different qualifications dependent on the destination for the learner. Clarity of purpose for qualifications at the offset will support their relevance to industry and the world of work.

The purpose therefore of 14 – 19 education and training in Wales could be to ensure a positive progression for all young people into or towards fulfilling employment or following further study. The needs of the Welsh economy are reflected in the available employment opportunities and it must be the responsibility of all involved to ensure that education and training leads directly or indirectly to young people being able to take up
these available jobs. Education and training provision, including qualifications, should not be taking young people on learning journeys that do not lead to positive outcomes for them. Here we would include the situation where a young person is led down an academic route when their chances of progression to HE are limited and they would be much better suited to the learning styles and outcomes offered by vocational qualifications. The purpose of positive progression for each young person needs to be held as the central bedrock for policy development now and in the future. This progression may need to be ‘horizontal’ in terms of qualification levels for the young person to finally progress to their preferred progression outcome.

Clear information advice and guidance for learners and parents is imperative, along with career advice which is fit for purpose and accessible. Literacy, numeracy, ICT skills and employability skills should be at the heart of the curriculum offered in Wales. Similarly, clear and accessible communication about qualifications and the qualifications system is crucial to assist employers to interpret the world of familiar qualifications.

We support an explicit commitment to supporting access to a range of qualifications (not just GCSEs) to ensure that learners have a choice regarding the type of qualifications they pursue and the opportunity to mix vocational and academic qualifications depending on their own particular needs and learning style.

The opportunity for learners to undertake vocational qualifications alongside general qualifications at age 14 – 16 both to provide an introduction to the world of work and to support the development of the ‘employability’ or progression skills that employers say that they is imperative. Likewise, active support for a vocational route as legitimate and indeed more beneficial for many young people at 16 – 19 in support of the primary purpose of positive progression to or towards employment.

Given that 80% of learners in Wales stay on in education and training we believe that it is important to see education and training as a continuous learning process from 14-19 and that we should guard against there being an artificial break in an individual’s learning programme at 16.

Qualifications that utilise the Welsh Language is imperative to support first and second Welsh language speakers in Wales, and we believe that the Welsh Government could take a more strategic lead in the setting of more detailed targets for providers which compliment the Welsh medium Education Strategy, including enhanced reporting on Welsh speakers and their demands and how this is satisfied. Given that language usage changes over medium to long term, we would encourage close co-operation with the Welsh Language Commissioner for Wales.

**Question A2.2**

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

City & Guilds believes that the qualification system in Wales should support the positive progression of every young person and that this cannot be delivered by limiting or seeking to impose tight constraints or structures on the qualifications system. It is our view that the statement that the Board is *recommending a simpler system that can be understood by all, with fewer qualifications* is unlikely to provide *more coherent personalised programmes of*
learning.’ This may not necessarily mean having fewer qualifications but is about being fully informed about the qualifications in particular sectors or subject areas and there is a key communication task here. A coherent shape to the curriculum followed by young people 14 – 19 allowing for flexibility and choice to support individual’s positive progression is key. Moving towards a curriculum model in Wales which has at its heart the skills that each young person needs to progress whether into further or higher study or directly into employment would be beneficial. This would be a natural move from the Learning Pathways and provides a clear context for education and training. We can see that there might be some attraction in making this an overarching qualification but we believe that this carries a number of dangers including the problems that were inherent in the Diploma model in England and the fact that this approach would not necessarily be ‘future-proofed’. Equally, the recent removal of the requirement for SSC support for qualifications is welcomed and will mean that awarding bodies will develop new but additional qualifications in order to address this situation over time.

City & Guilds has no wish to retain qualifications with limited numbers of learners and would support the withdrawal of these qualifications. However it is important to recognise that:

- it takes some two years from the launch of a qualification for there to be any established pattern of take-up
- some niche sectors/subjects/levels of qualifications in a suite will inevitably have small numbers of learners
- the current qualifications register does not remove qualifications that have been updated unless these are formally withdrawn by the awarding body

Choice of academic and vocational qualifications in a wide range of subject areas is necessary and we believe that any moves to reduce the number of qualifications is made on an reasoned and transparent basis. We do not believe the Welsh Government should impose a quantitative cap on the number of qualifications available; it is more important to focus on the value of the qualifications to learners and whether the qualifications can contribute to the achievement of the future vision for Wales.

The use of a measure (s) to present the equivalence of general and vocational qualifications, principally those used in Performance tables, can provide a way of interpreting the different qualifications that are available. However where these measures exist they must have an appropriate, consistent and a reliable basis. For example, if guided learning hours are used for this purpose it is important that these have been calculated in a consistent way. We would want any measure to provide a valid measure such that no qualification is ‘over-rated’ (as has been the case in the past) given that the pressures on schools around their rating in the Performance Tables will drive school behaviours and result in many searching out vocational qualifications with the highest GCSE equivalence. In this regard, City & Guilds believes that the new requirements in England for vocational qualifications to count in the Performance Tables at Key Stage 4 from 2014 are an unnecessary over-reaction to some issues with the Performance Tables in England. The new rules have artificially constrained vocational qualifications to be structured in the same way as GCSEs and this has little to do with the quality or otherwise of vocational qualifications. City & Guilds urge the Review Board and the Welsh Government not to move in the same direction.

Question A2.3
i) Should we retain existing brands such as GCSE, A level and vocational qualifications (such as BTECs, OCR Nationals or City and Guilds) in Wales, in the short to medium term?

[ ] Yes  [ ] No  [ ] Not sure

ii) Please give reasons.

Brands of qualification have a well established currency among parents, employers and the wider education system. Changes to qualification types or brands take many years to re-establish credibility particularly among employers, and therefore, City & Guilds supports the view that qualifications available to learners in Wales should be 'recognised and respected across the UK and internationally'. In order to achieve this, the full range of qualifications, including the vocational qualifications, should be available to young people in Wales. The value of the qualifications is determined by a number of factors and this includes their recognition by employers and Higher Education.

However, we have referred above to the dangers of nationally driven qualifications and qualification structures and pointed to the various failed attempts that there have been in England in this regard. Rather it is important that there is a period of stability in education and training, including around qualifications, that allows all concerned to use the qualifications already on offer and thus to consolidate the recognition and value of qualifications and associated brands in Wales.

We believe that the current qualifications offer should be retained in Wales because:

- The brands of higher volume vocational qualifications are strong and recognised by parents, teachers and learners both within and beyond Wales.
- These brands are recognised and used by employers many of whom operate across national boundaries in the UK
- The existing brand recognition benefits learners who chose to move across the Welsh border, in either direction, to access further education, higher education and/or employment.

Question A2.4

i) To what extent does the current suite of qualifications at 14–19 sufficiently encourage the development of literacy and numeracy?

[ ] Very much  [ ] To some extent  [ ] Not very much  [ ] Not at all  [ ] No opinion

ii) To what extent does the current suite of qualifications at 14–19 provide clear information about an individual’s literacy and numeracy?

[ ] Very much  [ ] To some extent  [ ] Not very much  [ ] Not at all  [ ] No opinion
iii) Please give reasons and any other comments.

The above questions are unclear as to what qualifications are being referred to. Appropriate literacy and numeracy skills are critical to all individuals as a foundation for their life and work. The assessment of these skills requires further consideration and scoping in order to improve the on-going poor PISA results for Wales. However we would strongly advise that there should be a proper identification of the perceived problems with the existing qualifications and then the solutions to any problems developed with the awarding bodies rather than abandoning these and starting again.

Literacy and numeracy qualifications such as Essential Skills Wales (or Functional Skills in England) seek to develop the application of English and maths in practical situations but it needs to be recognised that these qualifications can require more time to teach and develop the skills than more straightforward GCSE qualifications.

While Level 2 achievement in Maths and English is a reasonable aspiration, it needs to be fully understood that many young learners will have a much longer journey than others to this level. These learners benefit from smaller ‘stepping stones’ progress which may be marked and recognised by smaller qualifications along the way.

In relation to other qualifications, vocational qualifications will include elements of literacy and numeracy appropriate to the sector and/or job role covered by the qualification e.g. communication skills will be important in a Customer Services qualification and Numeracy will be a required part of most Engineering qualifications.

---

**Question A2.5**

i) Should there be a stronger external element in the assessment and/or quality assurance of all qualifications (through one or more of the methods suggested at A2.5)?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

ii) Please give reasons and any views on the types of external elements that should be involved in different circumstances:

City & Guilds supports the view that rigorous quality assurance of internal assessment provides a guarantee of quality without increasing the assessment burden on candidates or schools. However we accept that the nature and scope of awarding body quality assurance measures are not well understood by those outside the education and training world. This can lead to an incorrect comparison of external assessment (e.g. exams) to internal assessment (e.g. teacher marked assignments) without any recognition of the awarding body quality assurance processes that check and underpin that internal assessment. This may be due, in part, to a lack of communication about these technical and reasonably complex systems by awarding bodies and others to the wider users of qualifications. Equally, assessment methods and their related quality assurance processes should be developed to reflect the nature and required outcomes of each specific qualification in order for them to be reliable and robust.

iii) Should the volume of assessment at 14–19 be reduced?
iv) If yes, how could this be achieved?

One way would be to place some limit on the number of qualifications young people are entered for at age 16. In addition, review of the current AS/A2 model for GCEs may suggest changes here.

Of course, assessment must be fit for purpose.

Question A2.6

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

We would reiterate our views that young people need a balanced offer of qualifications including those of a vocational/technical nature which offer opportunities to engage young people in activities and work which is generally highly motivating. Vocational qualifications require a more student centred approach and the strong emphasis on the relationship to the world of work provides a relevance to the learning that many young people do not see in the study of general qualifications. Breadth of choice is vital along with opportunities for horizontal progression as appropriate.

Question A2.7

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

City & Guilds supports the need for the delivery and assessment of qualifications through the medium of Welsh where there is a clear demand for this. The support provided by Welsh Government for awarding organisations to make Welsh medium provision available is very welcome. This funding from the Welsh Government is critical as we move forward in order to meet the commitment made in its Welsh medium Education Strategy.

In support of this strategy it may be that the Welsh Government needs to take a more strategic approach to the support of Welsh-medium provision by identifying priorities/key areas for development rather than or as well as basing this support on the evidence of demand. This might result in a more coherent approach to increasing the availability of Welsh medium provision e.g. focussing on key areas where there is a clear need to expand the Welsh speaking workforce e.g. health and social care, retail etc.

It is also important to note that the assessment of qualifications in two languages has a standards (as well as a resource) implication as there is a need to ensure the standards required and achieved are comparable across the two languages.

City & Guilds supports and values the importance of the proposed new standards in the current consultation by the Welsh Language Commissioner for Wales (Standards and the Welsh language: What are your views?) The standards will be imposed on public sector bodies funded by the Welsh Government and private companies holding contracts with the public sector worth more than £400,000 a year, and the document states that everything from telephone calls to publicity, exhibitions, signage, and websites will be affected by the new requirements. The aim is consistency and clarity for the organisation in terms of what
they are expected to do and in terms of the service user and what they can expect as well. This may increase the need for Welsh Language training for English speaking workers within these organisations affected or for those not confident in using their current Welsh language speaking skills, and the need to develop more specific qualifications to meet that need. We would encourage the Welsh Government to consider training budgets to support the new proposed standards for those organisations, along with funding for awarding organisations in Wales to support the new standards for the creation of new/ enhanced qualifications. This should further increase the availability and particularly the quality assurance support for Welsh medium qualifications.

**Question A2.8**

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

The primary definition of ‘fit for purpose’ will depend on the target group for each type of qualification and the use to which such qualifications are out. To take the example of qualifications for school leavers whose main destinations will be further study or employment then direct involvement of employers and HE/FE in their development with awarding organisations would help in this respect.

In doing so, there is a need first to determine what the ‘purpose’ is that qualifications need to be fit for. (see A2.1), that is, it would be necessary for the Welsh Government to articulate the purpose of 14 – 19 learning (or 14-16 and 16-19) through a concise set of principles.

Of course, qualifications have to define their purpose and the intended age range of learners when these are submitted to the Welsh Government for accreditation. It is not clear what any additional review would add to this process if the regulation already requires qualifications to be fit for purpose.

**Equally, programmes of learning are not qualifications but they do need to be fit for purpose to meet the needs of each individual learner.** This is in the hands of the providers and therefore has to be assessed by the Welsh Government and Estyn.

As we have said above, qualifications need to support positive progression to employment or further study including in HE. In this regard City & Guilds has been clear that we do not believe that the current qualifications in the QCF provide the full coverage of the needs of 14 – 19 year olds. During the UK Vocational Qualifications Reform Programme (UKVQRP) and the population of the QCF all qualifications required SSC approval and their interest in, and understanding of, vocational qualifications for use with 14-19 year olds was variable. A number took the view that vocational qualifications should only be those occupational competency ones designed for those in work, including apprentices.

Clearly this was a very narrow view of the role of vocational qualifications and in some sectors left the needs of 14 – 19 years olds either unmet or at least ill served. As the requirement for SSC approval has now been removed, gaps in the QCF provision can be met. They need to show support for any new qualifications which can be from specific employers, employer groups, professional bodies and may still be support from an SSC. This ensures that the qualifications have the support of employers in the sector and is fit for purpose.
ii) How could evidence about the destinations, outcomes and progression of learners in relation to qualifications be improved?

While City & Guilds supports the use of outcomes and progression as key measures of performance, the difficulties of collecting this data should not be underestimated. This is primarily in the hands of providers as awarding bodies do not generally have a direct relationship with the learners taking their qualifications and most transactions with them are conducted through the approved centres (the providers). Many providers have systems and processes set up to gather this data but the completeness of the data is dependent on individual learners and their responsiveness to requests for data. Where gaps in data exist neither the provider nor the awarding body should be penalised in any way.

A destinations tracking system, making use of the unique learner number that operates across all sectors would make meaningful comparisons possible. We believe that Welsh Government should take a lead and develop a mechanism for the collection, analysis and reporting of data.

Question A2.9

i) To what extent should young people be able to take qualifications when they are ready rather than at an expected age?

| Very much | ☐ | To some extent | ☒ | Not very much | ☐ | Not at all | ☐ | No opinion | ☐ |

ii) Please give reasons and any views on how this might be achieved:

We endorse the approach of the Welsh Government in its strategy to reduce the number of young people NEET “to engage young people through sufficient provision at every level and in every style of learning”.and to ensure that “each young person will have an individually-tailored learning pathway, leading to approved qualifications and awards of credit at the right levels and at the right time for the learner to meet his or her needs, interests and aptitudes;” (Reducing the Proportion of young people not in education or training in Wales”).

We strongly support the approach of ‘stage not age’ as this goes some way to recognise the fact that 14 – 19 education and training is seeking to meet the needs for the entire range of the population across all abilities, socio-economic groups and location with an endlessly varied set of educational and life histories.

It is understandable that age 16 is seen as an important age as this currently marks an important transition from eleven years of compulsory education but given current staying-on rates this is increasingly less significant as a point of change for young people. However, it is crucially important that an initial assessment or diagnostic is conducted to identify the ‘stage’ of the learner and their next progression aim so that the most appropriate programme of learning is devised for them with the most relevant qualifications.

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

**The existing external qualifications should be retained in Wales at least in the short-term.** The important thing is to ensure that any move should not disadvantage learners and their opportunities to progress in the wider education and jobs market, both nationally and internationally. We believe that the recognition of qualifications and particularly their transferability across the Welsh border into England is essential to support the mobility of learners. While these external qualifications are retained in England and act as a ‘currency’ used by employers and educational providers at and post 16 any move away from the existing qualifications could act as a significant barrier to the smooth transition of learners across borders.

Also see answer to Question A2.10

**Question A2.10**

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

We would expect the needs of Wales in relation to qualifications to be expressed in the context of the agreed purpose of education and training for 14 – 19 year olds. If, as we propose, this is the positive progression of all learners directly or indirectly (after further study) into appropriate employment then the qualifications would support this. (see answer to Question A2.1)

As stated above we support the aim of the Learning pathways 14 – 19 that we should ‘help learners develop the wider skills they need for life and work’ and this will need to reflect the educational, social and economic needs of Wales. Putting the learner at the centre of their education and training is in line with children and young people’s rights and the UNCRC which are supported through educational frameworks e.g. the Schools Effectiveness Frameworks.

However, whilst we recognise the need for qualifications to meet the specific needs of Wales we also feel that the recognition and transferability of qualifications achieved in Wales is of the utmost importance. Qualifications must support learners in their progression to further education or employment which may well take them beyond the Welsh border into England or beyond.

ii) To what extent do you think that qualifications at 14–19 should be allowed to diverge from those in England, in order to better meet the needs of Wales?

| Very much | ☐ | To some extent | ☐ | Not very much | ☒ | Not at all | ☐ | No opinion | ☐ |

iii) Please give reasons for your answer and state whether your views apply to all qualifications or some particular types.

We would urge caution in any move which may result in unforeseen barriers to progression.
to institutions in other parts of the UK. We however recognise that the changes to education in England ‘do not necessarily reflect the policy objectives of the Welsh Government’.

We also recognise the need for qualifications to meet the needs of Wales and not to be forced to follow the developments in England but we are concerned that the Review Board seems to have taken the view that the risks associated with divergence are limited. We believe the Welsh Government must fully appreciate the financial burden on awarding organisations when required to develop qualifications, and in this sense the least divergence is required. Only very specific elements of qualifications which could be supported by generic units can meet the unique needs of Wales, as the vocational purpose of a qualification in the main should remain constant. We need to operate in a cost effective way.

The process for establishing the need for a vocational qualification and then designing, developing and delivering that qualification is complex and is dependent on a number of variables including the type of qualification, the intended learners, potential funding source and the need for regulation.

We would advise caution if divergence between England and Wales gathers momentum and request full consideration of the implications for an awarding organisation and learners, which could also limit choice of qualifications that are recognised across the national borders in the UK and internationally. It may also be the case that providers find ways to offer ‘English’ qualifications in any case as happens currently in Scotland e.g. our PTLS and DTLS qualifications.

We would urge care to ensure that any divergence is based on sound evidence of need and should not be allowed to escalate without proper and transparent support. Where there is no robust and extensive evidence to support divergence we strongly recommend that the same qualifications should be offered in Wales and England. We also question the capacity of Wales to support its own qualifications system – for example, there may be the need for additional regulatory infrastructure if qualifications are to be provided in Wales only.

We also believe that there is considerable potential for the national contexts to be reflected in common qualifications. This can be achieved if qualifications at all levels are written in a way that allows the content to be set within the Welsh (or English, Scottish or Northern Irish) context e.g. to reflect relevant legislation. Furthermore, optional and endorsed pathways can allow further specialism that could meet the needs of Wales and delivered in a meaningful way to Welsh learners. Where qualifications have been developed with very detailed and prescriptive content requirements this is more difficult.

**Question A3.1**

i) What are your views on the content, delivery, relevance and value of the current Welsh Baccalaureate Qualification?

We recognise the significant progress that has been made to develop the recognition of the Welsh Baccalaureate Qualification (WBQ) to date and we believe that a key factor in this has been the ability to use existing qualifications in its options. City & Guilds, as a member of FAB Wales, has contributed to the development of an alternative approach which is covered in the FAB Wales response to the consultation.

Of course, the roll out of the Welsh Bac has resulted in schools making some awarding
organisation choices which were not fully assessed or considered, as an automatic assumption was made that e.g. only the WJEC offered Basic and Key Skills/ESW. We also note further developments such as a post 16 Welsh Bac for FE.

ii) What are your views on the further development of the Welsh Baccalaureate Qualification as the overarching qualification for Wales?

We of course support the desirability of young people having ‘a well-rounded and coherent education’, and we have worked to propose a new approach which, in outline, consists of a compulsory defined core of Progression Skills; a compulsory element of Technical Skills that would require all learners to show evidence of Maths, English, ICT and ideally Science and Technology and Welsh language; and a Subject Development Component which takes up the majority of the learning time and would be chosen to support the particular progression aspirations of the young person whether this into employment or further study.

We believe that there are different ways in which this could be established which include As an overarching qualification; a curriculum framework; or a Programme of Study. Our support is for the framework approach not least because the current WBQ could be accommodated within this framework relatively easily and it would also allow for new and innovative provision to be developed to meet the full range of learner needs. We should emphasise that we do not envisage the development of large numbers of frameworks – just that the achievement of all of the required elements is recognised through a Welsh Framework certificate.

In the development of this approach, it will be important to build on the achievements and lessons learned from the Welsh Baccalaureate. We suggest that some of the key principles to guide this new approach are that it needs to:

- be flexible to meet the varied needs of learners and support positive progression
- provide for the needs of all students including those with learning difficulties and the disengaged.
- allow achievement at different levels across the framework – a spikey profile
- allow for accreditation and certification of each of the components
- components elements should be made up of units/small qualifications that recognise partial achievement counted. where appropriate
- elements can carry grading, where appropriate
- support the integration of the delivery of elements across the framework where possible
- the development of Welsh Language skills should be compulsory to at least the age of 16

iii) In what ways would you like to see the Welsh Baccalaureate Qualification changed or developed?

We strongly believe that all awarding organisations should be able to offer the Welsh Bacc/ or the new curriculum framework or similar qualification is offered going forward. However, many AOs contacted by the Welsh Government when asked about their interest in offering
the Welsh Bac, mentioned that the aspect of data aggregation for the Welsh Bac should be carried out by an independent organisation – a Data Aggregation Service for Wales, as the costs of this service are substantial and should not be borne by one awarding organisation. Another, implication is the need for shared access to data take up within Wales and across providers.

iv) To what extent should the Welsh Baccalaureate Qualification be universally adopted by learners in Wales?

<table>
<thead>
<tr>
<th>Very much</th>
<th>To some extent</th>
<th>Not very much</th>
<th>Not at all</th>
<th>No opinion</th>
</tr>
</thead>
</table>

It should be only be an option if appropriate for the individual learner.

Question A3.2

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

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

or

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

or

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

ii) Please give reasons.

Our belief that it is important for the overall education system in Wales to reflect the cultural and economic needs of Wales but that too great a divergence would impact on the recognition of qualifications and learner achievements across the borders of the UK.

We cannot support Option 1 not least because of the significant destabilising effect on education in Wales.

Option 2 presents significant risks that the Welsh Government would need to consider and manage including the recognition of these different GCSEs by FE, HE and employers across the UK if learners move out of Wales. In both Option 1 and 2 the arguments put forward in answer to Question 2.10 apply – that there is the potential for awarding bodies not based in Wales to withdraw from the market. The qualifications industry should be as open and competitive as any other and that the well-rehearsed benefits of competition should be made available to customers in this market within the oversight of the qualifications regulator(s). However, it is clearly incumbent on AOs to ensure that any contextualisation of content to Wales is implemented as additional optional components of the qualification, including
consideration of Welsh Language requirements, and across any particular policy areas e.g. health care.

With regard to Option 3, it would be foolhardy for the Welsh Government to adopt GCSE developments in England wholesale without careful consideration about the desirability of any changes, their fitness for purpose for Wales and the impact on learners and providers. However this does not mean that the English GCSEs should be rejected out of hand for all of the reasons that are set out in relation to Options 1 and 2 above.

**Question A3.3**

i) Are A levels fit for purpose for young people in Wales at 16–19?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
</table>

ii) Please give reasons for your answer.

In general yes though they are not suitable for every young person in this age group. It depends on the ambitions and aspirations of the person involved. A levels are not the best preparation for direct entry to the labour market where more vocationally based provision would be better.

We also wonder why the Review Board considers that divergence from England is feasible and even desirable for GCSEs and not proposed for A levels. This is not to say that we support divergence for the sake of it but rather than we would have expected a more coherent approach to general qualifications, particularly given the relationship between GCSEs and A levels.

**Question A3.4**

What are the key issues in relation to vocational qualifications at 14–16 and 16–19?

The most important issue is that qualifications for this age group should be valued by employers and other education providers and offer a broad learning experience. We would not support the use of competence based NVQ type qualifications in schools, and the implications of doing so are well rehearsed. Increasing the understanding of parents of competency qualifications is also an issue when FE are having to place leaners on a lower level NVQ than the expectation of parents.

The study of vocational qualifications alongside general qualifications at 14 -16 can provide learners with a taste of the world of work to better inform their choices at 16 and have an introduction to the different style and approach of vocational education. We are concerned however that vocational qualifications are continually asked to provide more evidence and meet more criteria than general qualifications, but do support the robustness of internal assessment, whilst still recognising a major communications and confidence building exercise is needed if vocational qualifications are to seen as a valid and valuable educational route for all learners. Linked to this is the recognition, or more often lack of it, by Higher Education of vocational qualifications for entry to degree programmes, and the fact that vocational qualifications often play a key role in motivating those pupils who do not succeed in academic study across all of their subjects.
Question A3.5

i) To what extent are Essential Skills Wales qualifications relevant and valued?

<table>
<thead>
<tr>
<th>Very much</th>
<th>To some extent</th>
<th>Not very much</th>
<th>Not at all</th>
<th>Don’t know</th>
</tr>
</thead>
</table>

ii) Please give reasons.

We recognise the need for young people to achieve English, maths and ICT at appropriate levels, although this needs to recognise the position and progression aspirations of each learners as well as the needs of employers and HEIs. The emphasis on practical application within the Essential Skills Wales qualifications is extremely relevant, although as a relatively new qualification it has had relatively little time to achieve currency with employers and other stakeholders.

Any qualification needs to be reviewed regularly and it is appropriate to take this opportunity to do this with Essential Skills Wales and particularly the extent to which the delivery model has proved appropriate across all provider settings. One of its main weaknesses is that it is a ‘one size fits all’ qualification, with no real scope to recognise partial achievement or progress towards full achievement of the standard (e.g. there are no units, nor scope to reflect a ‘spiky’ profile).

Whilst we fully understand and support the desire for a discrete suite of English, maths and ICT qualifications, we would again caution against too much divergence - especially if there is a desire to move towards external assessment.

iii) To what extent are Wider Key Skills qualifications relevant and valued?

<table>
<thead>
<tr>
<th>Very much</th>
<th>To some extent</th>
<th>Not very much</th>
<th>Not at all</th>
<th>Don’t know</th>
</tr>
</thead>
</table>

iv) Please give reasons.

The concepts behind the wider Key Skills remain highly relevant and important to learners’ progression in all aspects of learning and work. However, the qualifications have not always reflected those concepts adequately and can sometimes lead providers towards very mechanistic evidence gathering that loses sight of their actual purpose.

It might still be possible to make a case for retaining a suite of ‘wider skills’ qualifications, although with the advent of the QCF it should be noted that many of these skills are also addressed through other employability and personal/social skills qualifications offered by a number of awarding organisations.

At the very least, the current wider Key Skills standards would need a substantial overhaul to help ensure that they encourage good teaching, learning and assessment practice.
Question A3.6

i) Should more emphasis be placed on STEM subjects in the 14–19 phase?

[ ] Yes [ ] No [ ] Not sure

ii) If so, how might the qualifications system contribute to this?

We support the provision of STEM subjects for all young people but for a ‘spikey profile’ as young people need to see these subjects as relevant to their future progression and their progression aspirations will be many and varied. The demand for STEM skills is strong and is set to grow in the coming years. STEM skills need to be accompanied by employability skills and a general lack of these latter skills is a key barrier to the recruitment of STEM qualified applicants.

Question A3.7

i) Do you think that the Welsh Government should launch a major communication campaign in relation to qualifications in Wales, once its new policy is established?

[ ] Yes [ ] No [ ] Not sure

ii) Do you have suggestions about the messages of the campaign and how to make it effective?

We have already referred to the need for better communications about vocational qualifications in order to build the understanding and confidence of learners, their guardians, teachers, employers and others.

Any communication campaign should:
- provide a clear message about the value of vocational qualifications so that they are seen by learners, parents and carers as a positive choice
- recognise that the campaign will need a number of different strands aimed at the range of different stakeholders
- include a strand targeted at employers to provide clear explanation of the qualification system and how they can interpret the qualifications that they encounter so that they better understand those qualifications including which ones are occupational competency ones and which are not.
- provide clear illustrations of possible progression routes available using different types of qualifications and promote the equal value of these routes.
- include case studies of learners who have progressed to meaningful outcomes (via a variety of routes) as this may help to bring the campaign alive.
- be sustained over a period of time to ensure the messages are reinforced and understood by the full range of stakeholders – a one hit campaign is not an effective model of communication.
- utilise a mix of media, thus making it accessible to a range of stakeholders and age-groups e.g. young people more likely to use Facebook etc. whilst some employers
iii) How could learners be better supported, informed and advised when choosing qualifications at 14 and 16?

City & Guilds believes that the quality of Information, Advice and Guidance (IAG) is vital if learners are to be well supported and advised when they are determining their intended progression route and the qualifications that they need to support that route and which are most appropriate for them as individuals. The recommendation made in the report of the Inquiry into the implementation of the Learning and Skills (Wales) Measure 2009 to require local providers to produce a joint prospectus containing impartial advice about courses and training opportunities would assist the process.

We support the inclusion in WG policy and Careers Wales practice of many of the elements of good IAG that it believes are crucial:

- The provision of access to high quality and impartial careers advice and guidance to young people, parents/guardians from the age of 13. FAB notes the findings of the Inquiry report that the provision of impartial advice is not yet happening consistently.
- The need for IAG staff to be very knowledgeable about the full range of opportunities open to young people in order that the advice that they give is truly impartial.
- Supporting advisors to develop their knowledge of the full range of qualifications, how learners can access them and the progression routes that each can offer to learners in a local and national context.
- Investing in the development of information sources that explain the alternatives to an academic pathway in clear, assessable language.
- Funding of this provision so that is meaningful and learner-focused.
- Providing guidance to schools on how to embed career advice throughout the curriculum instead of bolting it on as an extra activity.

We also note the requirement made in the Inquiry report to ensure that best practice in learner support is being disseminated effectively.

Additional comments

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 may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here:
Part B: Technical and specialist issues

Please feel free to answer some questions and not others. For discussion of each issue please refer to the consultation paper. Question numbers correspond to section numbers in the consultation paper.

Question B2.2

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

[ ] Yes  [ ] No  [ ] Not sure

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

Yes this is very important for a broad education. Young people should be following programmes of study that support their progression aspirations and are appropriate to their own learning style. We are aware of the work being undertaken on the Learning Area Programmes (LAPs) but have worked to propose a slightly different Curriculum Framework that would support this approach in which the role of qualifications is critical in recognising the young person’s achievement within that programme. The individual aspirations, abilities and personal learning styles of learners mean that many will require a mixed curriculum programme with elements of both academic and vocational learning and of both formal and informal assessment.

We do not believe that it is always necessary for elements of learning and development to be assessed and we would not support artificial assessment and certification of elements of development. However our experience is that it is where an element is not recognised through assessment towards a unit or qualification, there can be a tendency for the element(s) to be given a low priority within the programme/framework. Here the role of inspection and/or other monitoring can play an important part.

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

Very limited at best. It is still early days for the full implementation of credit-based qualifications and to have solid evidence of the benefits that have been the held up as the justification for the development of the Qualifications and Credit Framework (QCF) qualifications. Schools and colleges report to awarding bodies that benefits have included an increase in attendance and a reduction in problematic learner behaviour.

Credit-based learning can allow for increased progression opportunities across different sized qualifications within the same subject but also may allow for movement across subject areas where some workforce requirements have commonality but this is for those in work. During the development of the QCF, SSC approval was required for all qualifications and this led to a serious neglect of the needs of those in full time education. QCF provision was not designed for this age group and we would urge the review to consider the position now.
iv) What are your views on the future role of credit-based qualifications in the 14–19 curriculum?

They are not appropriate as they were designed for adults studying in the workplace.

The way QCF was developed has not delivered the full potential of a credit and qualification framework. Given Wales’ commitment to the CQFW this is of critical importance for Wales. We have referred above to the impact of SSCs approval on the nature of qualifications that have been developed in the QCF and particularly for 14 – 19 year olds.

There are a number of technical issues that need to be addressed in the QCF which have to be addressed in a systematic and measured way. Those that have responsibility for the details that underpin the qualifications system – awarding bodies with the regulators – deal with these issues.

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

The Learning and Skills (Wales) Measure 2009 already provides a legislative framework for all learning organisations delivering to 14-19 years to work collaboratively with each other to construct and support individual learning pathways for young people. We note the evidence of progress in collaboration reported in the Inquiry report and the centrality of effective IAG, including careers guidance, to ensure that learners are aware of the full range of provision that is available and are matched to be type of learning that it might be best suited to them and will best support their progression. Schools in particular must support learners to take steps that put the needs of the learner first and not the needs of the school so that a move from the school to college or work-based learning is supported if this is right for each individual. We support the suggestion in the Inquiry report of the attendance of college staff at school parents evenings, particularly is providing information about the range of vocational options. By forming closer relationships with other types of providers in the area, schools will be better able to advise learners of the options available to them and steer them in the direction of appropriate, high quality, local provision.

Question B3

i) Should the number of qualifications approved for public funding at ages 14–19 be reduced?

| Yes | ☐ | No | ☒ | Not sure | ☐ |

ii) If so, which qualifications should no longer be available at 14–16 and/or 16–19?

See our answer to Question A 2. 2

We have no wish to retain qualifications with limited numbers of learners and would support the withdrawal of these qualifications and we would support any activity that aims to remove qualifications that have had no take up in the last three years. There is almost certainly some
amount of housekeeping that could be carried out to remove out of date qualifications from the funding list. However, it is important that any process to remove qualifications provides an opportunity for awarding bodies to present information or data that may support the continuance of a qualification. The investment in developing a qualification is considerable and where an awarding body has also recently invested in marketing activity that may drive increased take up of a qualification there has to be a case to retain the qualification, not least because providers may have included the qualification(s) in their planning.

It is important to recognise that:

- it takes some two years from the launch of a qualification for there to be any established pattern of take-up
- some niche sectors/subjects/levels of qualifications in a suite will inevitably have small numbers of learners
- the current qualifications register does not remove qualifications that have been updated unless these are formally withdrawn by the awarding body and this is a process with some resource implications for the awarding bodies

Beyond this general housekeeping activity we do not feel there is a need for any more radical rationalisation of the list of qualifications for funding. We believe that market forces will prevail and we would therefore expect the qualifications that are valued by learners and employers to gain registrations while others attract diminishing numbers of learners and in time are removed from the qualifications Register.

Furthermore, we do not believe that learners, teacher or employers ever need to consider the full range of qualifications available. Rather they become very familiar with those that are available within their sector or subject area; indeed Professor Wolf states on Page 56 of her report that she knows 'of no empirical evidence to indicate that employers, in the past, had any trouble understanding and evaluating the vocational qualifications specific to their sector'.

**Question B3.1**

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

City & Guilds believes that a qualification should be retained on the list approved for public funding where:

1. it is in line with Welsh Government policy and vision for 14-19.
2. it is accredited by a regulator
3. It is supported by employers and other stakeholders (this would have been evidenced in order to have it accredited by the regulator)
4. It offers meaningful progression to learners
5. It has a reasonable level of take-up after a 3-year period (this must be viewed in relation to the size of the sector at which it is aimed).
Question B3.2

i) To what extent should employers play a role in the development of qualifications for 14 to 16-year-olds?

<table>
<thead>
<tr>
<th>To a great extent</th>
<th>To some extent</th>
<th>Not much</th>
<th>Not at all</th>
<th>No opinion</th>
</tr>
</thead>
</table>

ii) To what extent should employers play a role in the development of qualifications for 16 to 19-year-olds?

<table>
<thead>
<tr>
<th>To a great extent</th>
<th>To some extent</th>
<th>Not much</th>
<th>Not at all</th>
<th>No opinion</th>
</tr>
</thead>
</table>

iii) Should Sector Skills Councils be the main mechanism for this?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
</table>

iv) Please give reasons.

Sector skills councils have struggled to represent the views of, for example, SMEs and are not funded to do so effectively. This is a particular issue for Wales which consists predominantly of SMEs.

Equally we have long recognised the valuable contribution that employers can make to designing vocational qualifications that help young people become “work ready”. This recognition has ensured that for over the years we have established links and positive working relationships with a range of employers and have involved them in shaping the development of appropriate qualifications that then have relevance and credibility for learners and providers. It is important to ensure that the Vocational Qualifications meet the needs of the sector to which they relate and it is therefore essential that employers are amongst the stakeholder groups involved in the design phase of a qualification. Employers engage with vocational qualifications as individual employers, trade associations, professional bodies as well as through SSCs. As such, their role can include both the demand and supply side of vocational education and can include:

- Sharing information about their current and forecast workforce skills needs
- Purchasing training and associated qualifications for their workforce
- Involvement in designing and developing vocational qualifications
- Having their own workplace training accredited
- Using qualifications as part of the recruitment process
- Providing opportunities to up skill the teaching profession through placements
- Provide exposure to the workplace for young people
- Support young people make better informed careers choices through presentations

However, we also believe that there needs to be an appreciation of the limits that there inevitably are to the extent of the involvement that employers can have to the design, development and/or the delivery of qualifications. Some considerations are resources...
(including time), qualifications being inappropriately influenced by the requirements of a handful of larger employers; different sectoral views; employers seeking specific as opposed to those required by a wider group of learners, particularly the 14 – 19 year old cohorts.

Having experience and extensive expertise in qualification design and the design features of a robust, high quality qualification need to be balanced against the desires of employers. We are experienced in striking this balance.

However, employers have a key contribution to make in helping young people become more work ready. This is through providing high quality work experience placements that support the practical development of skills included in vocational qualifications and in getting involved in helping with the delivery of these vocational qualifications and employability/progression skills to bring a reality and additional relevance to the study of these qualifications.

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

<table>
<thead>
<tr>
<th>To a great extent</th>
<th>To some extent</th>
<th>Not much</th>
<th>Not at all</th>
<th>No opinion</th>
</tr>
</thead>
</table>

vi) Please give reasons.

We suggest that some of the points that we have made in answer to the question above apply to the involvement of universities in A levels. These include the fact HE involvement needs to go beyond just the Russell group of HEIs and should be representative of the range of HE providers.

It is also important to recognise that not all learners who take A levels do so with a view to progressing to HE. Many will progress into employment and A levels therefore need to take this into account.

**Question B4.1**

i) How should learners' literacy and numeracy skills at 14–16 be assessed?

It is crucial that all 14-16 learners have the opportunity to develop their literacy and numeracy skills in a range of contexts, and that any assessment they undertake includes practical application as well as theoretical knowledge. The qualifications and assessment models they follow need to reflect these principles, but should be designed specifically for pre-16 learners and with an assessment model that is manageable for schools. Crucially, the needs for these learners should not be conflated with the (often very different) patterns of post-16 literacy and numeracy learning, where greater learner autonomy is more common.

ii) Which of the options listed do you prefer? (Please delete as appropriate.)

Integrating subject-specific expectations for literacy and numeracy skills into the subject criteria for each of the next generation of GCSEs.
iii) Please give reasons and any further comments.

One of the weaknesses of the current ESW model is it imposes a single qualification/assessment model on all learners and providers regardless of age and the degree of personal autonomy learners have developed. We think ESW should be positioned more explicitly for post-16 provision, although many of the concepts that underpin should nevertheless be reflected in 14-16 pedagogy and assessment – albeit through a different qualification.

Question B4.2

i) Should post-16 full-time learners who have not achieved Level 2 in literacy or numeracy be supported to reach this standard?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

ii) Please give reasons and any views on how this might be achieved:

We believe that post-16 learners should be given an appropriate range of qualifications to support their engagement and progression towards Level 2. This should include ESW and other ‘skills development’ qualifications, as well as GCSE where appropriate. As above, the emphasis should be upon practical application of literacy and numeracy within life, learning and work.

Question B5.1

i) Should the Welsh Baccalaureate be graded at Foundation level in due course?

| Yes | ☐ | No | ☒ | Not sure | ☐ |

ii) Should the Welsh Baccalaureate be graded at Intermediate level in due course?

| Yes | ☐ | No | ☒ | Not sure | ☐ |

Question B5.2

i) Should GCSEs continue to be available to learners on a unitised basis?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

ii) What are your views on the amount of ‘terminal assessment’ that is appropriate (it is currently 40 per cent)?

We would argue that the system, including GCSEs, needs as much stability as possible and
unless there are very pressing reasons for change the assessment should remain as it is.

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

As above.

iv) What are your views on controlled assessment? How could it be improved?

As above.

v) Should controlled assessment be retained as a feature in the next generation of GCSEs in Wales?


vi) If yes, should controlled assessment be retained for most GCSEs or only for some?


Question B5.3

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

We would argue that the system, including GCSEs, needs as much stability as possible and unless there are very pressing reasons for change the qualifications should remain as it is.

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

As above.

Questions B5.4

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


ii) If yes, what should this maximum number be?
We are concerned that the drift to pupils taking a large number of GCSEs does not add to their overall preparedness for their progression at 16 and particularly this means that there is limited space in the curriculum for the study of any vocational qualifications which we would support. Where learners are not suited to the GCSE style learning and assessment and/or do not wish to have this as the only learning they undertake, we believe that a good range of vocational qualifications should be available to learners either to be taken in combination with GCSEs or in place of them.

Having said that, we believe that schools should be determining the curriculum that best suits the needs of all of their pupils and this should include the number of GCSEs that each learner should pursue. We believe this should be decided in tandem with the learner, based on their abilities and goals for the future - placing a national cap on the number of GCSEs may restrict some options of some learners for whom a larger number of GCSEs may be appropriate and suit their learning style.

Question B5.5

i) Assuming the continuation of A levels in Wales, should AS levels be retained as a stepping stone to A levels?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

ii) Should A level learners be able to take modules before the end of the course (AS and/or A2)?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

iii) Should learners be able to retake A level modules to improve their grade, without having to resit the whole qualification?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

iv) If yes, should the best mark or the most recent mark count?

| Best mark | ☒ | Most recent mark | ☐ |

v) Should retakes of modules be limited to one per module?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

Question B5.6

Should Wales adopt the IVETs and CVETs definitions for vocational qualifications?

| Yes | ☒ | No | ☐ | Not sure | ☐ |
Question B5.7

i) Do you agree with the proposed recommendations for limiting vocational qualifications at 14–16 to 40 per cent of learning time?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

ii) Do you agree that at 14–16 vocational qualifications should be broad-based and not attest to occupational competency?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

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

| Yes | ☒ | No | ☐ | Not sure | ☐ |

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

We do not see any benefit in such a move. It is critically important that vocational qualifications remain distinctive, provide a relevant and realistic introduction to the world of work and are assessed in an appropriate way. We would certainly not support this rebranding if it means that the criteria for GCSEs would be imposed on vocational subjects. We note with concern the requirements placed on vocational qualifications in England to adopt the key design elements of GCSEs in order to be included in the Key Stage 4 Performance Tables. We believe that this has put pressure on awarding bodies to artificially make vocational qualifications look like GCSEs and that many will be the poorer for it – making a qualification the same size (120GLH) as a GCSE does not make the qualification any better, higher quality or more appropriate for young people.

Rather it would be more beneficial for learners if the Welsh Government were to invest in a clear definition of Vocational qualifications and the promotion of their benefits to a range of stakeholders. Vocational qualifications should be clearly identifiable as such and their perceived value and relevance should be for what they are and not as some form of GCSE.

It should also be noted that the term vocational qualification is used to describe a very wide range of qualifications that fulfil a number of purposes, including:

- entry to a professional body community or as a progression towards entry
- a licence to practise in a particular job role and/or industry
- recognition of knowledge and skills that demonstrate occupational competence in a particular role or function e.g. customer service qualifications
- preparation for progression to one of the above
- introduction to a sector of industry and possibly a particular branch of that industry
- preparation for the world of work.

Often the user of the term ‘vocational qualification’ will have any one or more of these types of qualification in mind, but will make statements that are then taken to apply equally to them all. This generalisation (by policy makers and others) undermines the tremendous contribution that vocational qualifications of different types make to the lives of learners, risks
neglecting the needs of large numbers of young people, and contributes to creating an unclear perception of vocational education.

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

Please see section A2.5 above.

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

Please see section A2.5 above.

Question B5.8

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

| Yes | ☒ | No | ☐ | Not sure |

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

When the learners are employed as apprentices.

CVETs would be appropriate for those 16 – 19 year olds who have a clear progression aspiration to move into employment at age 19 or at any stage before that. Some will be undertaking apprenticeships in this period but many others will have a more flexible and/or varied programme of study at this age.

Question B5.9

i) Do you think there should be a greater external element in the assessment of Essential Skills Wales?

| Yes | ☐ | No | ☐ | Not sure | ☒ |

ii) Please give reasons and any views on the kind of external element you think should be used.

We certainly agree that the assessment model should include greater structure and rigour, although this is not necessarily (or only) delivered through external assessment. Having worked extensively with Functional Skills in England, we are mindful that a wholly external model would be costly to develop and maintain, and a Wales-only solution would not benefit
from the economies of scale that have helped to make Functional Skills viable in England.

If external assessment is to be used, we would suggest that its purpose should be confirmatory and focused on technical literacy/numeracy skills (that lend themselves to an objective test) rather than application; we would caution strongly against over-assessment and any additional external element needs to be balanced with a reduction in the volume of what needs to be evidenced through internal assessment.

iii) Do you think that Essential Skills Wales should be graded?

| Yes | ☐ | No | ✗ | Not sure | ☐ |

iv) Please give reasons.

It should remain a ‘threshold’ qualification for which there is a clear competence standard that all candidates must meet and only limited compensation. There may be a case for other ‘developmental’ qualifications that support progression towards that standard.

Question B5.10

i) Do you think the Wider Key Skills need a clearer title?

| Yes | ✗ | No | ☐ | Not sure | ☐ |

ii) If so what should they be called?

We think the ‘wider’ distinction (and for that matter the notion that these are ‘soft’ skills) gives entirely the wrong impression of the real importance and relevance of these skills to the world of work.

iii) Do you have any views on the content or assessment of the Wider Key Skills or the progression they offer?

The nature of these skills makes it difficult to see how they could be addressed adequately through an objective test, although there may need to be greater clarity around the degree of candidate independence and importance of displaying these skills consistently over time.

It may also be worth considering if a discrete suite of ‘wider’ qualifications is still needed, or whether these skills and qualities could be addressed adequately though other units/qualifications.

Question B5.11

i) Are entry level qualifications currently meeting the needs of less-able or less-engaged students?

| Yes | ☐ | No | ✗ | Not sure | ☐ |
ii) Are any changes needed?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

iii) Could any of the proposals in this consultation paper impact adversely the provision of appropriate qualifications for less-able or less-engaged students?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

Please give comments.

Some of the Entry level literacy/numeracy qualifications that preceded ESW allowed a ‘spiky’ profile of unitised attainment to be recognised, and we are aware that it can be difficult for some learners to attain a full ESW qualification. We see a need for a much richer mix of bite-sized accreditation and formative learning to help engage learners and recognises their ‘journey’ as well as a final outcome.

We are concerned that a shift towards wholly summative external assessment (particularly if there is no formative support to help learners reach that point) would be likely to have a negative impact on engagement and attainment.

**Question B5.12**

Do you see a role for the delivery and funding of QALL units within programmes of learning for 16 to 19-year-olds?

| Yes | ☒ | No | ☐ | Not sure | ☒ |

If yes, what would they add?

From one perspective, there might be a case for this in certain circumstances, although a more flexible qualification offer might address many of the issues that can currently only be met through QALL. Of course, credit based qualifications or units of QCF qualifications now provide some of the flexibility that previously only QALL units could provide. We appreciate that credit achievement for additional learning areas has a role in providing a breadth of learning experiences and can be a confidence builder and provide motivation to progress to further learning.

However, following wider discussion regarding the QALL pillar, we are mindful that the public purse going forward may only be able to focus on delivering qualifications according to the Welsh Government’s proposal for a new vision for 14-19 education and training in Wales following the current review, and as such, any mandatory components of qualifications should be clarified along with their purpose, and a choice of subject specific pathways made available for learners. It is not clear if and why the funding of QALL units from the public purse is necessary for this age group.

Other concerns have been around the fact that there has been no transparency of QALL available units which means that take up is very low or perceived to be very low. Equally demand has been driven by a series of projects funded from the public purse, and it is questionable whether this can continue in to the future. This is not to say that the original
purpose for QALL was and is not to be celebrated, but, rather, given that it is impossible to quantify all learning during a lifetime, it may be more beneficial to focus on key mandatory learning. Usage of generic components of a curriculum framework or the successor of the Welsh Bac if suitable e.g. research, project/investigation components and the generic gathering of evidence for portfolios for assessment purposes could satisfy personal learning interests that sit outside any QCF qualifications. Reducing the number of qualifications approved for funding in Wales is polarised to the aim of the inclusion of all learning within QALL units.

That said, we are open to further and ongoing consideration of evolved Welsh Government strategy concerning QALL following the review. We also have a large proportion of business around accreditation of employer in-house training. Whilst this does not comply with the QALL pillar currently, any further inclusion of recognition of training outside the QCF would be welcomed, and potentially could be included within a QALL pillar. This would extend recognition of all of the learning taking place outside of the QCF.

Question B5.13

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

Please see answers to previous questions around the Welsh Language. It is unclear what is meant by ‘improving’ the offer – increasing the number of qualifications; their content; qualification support or planning to satisfy demand; implication of related costs etc.

Any literacy/numeracy qualifications should be designed to support delivery and assessment in either/both languages, along with teaching qualifications. Flexibility around approaches to assessment (and especially appropriate titling of qualifications) is a necessary part of this, as it appreciating the distinction between literacy and numeracy.

A strategic approach by the Welsh Government would be beneficial, and possibly a regionally clustered approach to planning and delivery across Wales, or usage of ICT to create online communities of learning in particular subject areas to support learners and teachers. We would welcome being part of a Welsh Government Focus Group to look at this issue in detail.

Question B6.1

i) Do you agree with the proposal to reaffirm the importance of the Level 2 Inclusive and Average capped points score at Key Stage 4?

[ ] Yes  [ ] No  [ ] Not sure

ii) If not, please explain why.

We have indicated in our answer to Question B4.1 that Maths and English GCSEs does not provide and meet the literacy and numeracy requirements of all learners. Therefore we believe that there should also be mechanisms within these performance thresholds for wider
iii) Do you think there should be any changes to the post-16 measures?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
</table>

iv) If yes, please outline what these should be.

This question can only be answered in the context of the confirmation of the Welsh Government’s vision for a qualification ‘framework’ or ‘structure’ for Wales and subsequently any identified potential changes required that would underpin the defined specific purpose of individual qualifications.

v) Should we remove any measures, or are there any additional measures we should include?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
</table>

vi) If yes, please outline your suggestions.

This question can only be answered in the context of the confirmation of the Welsh Government’s vision for a qualification ‘framework’ or ‘structure’ for Wales and subsequently any identified potential changes required that would underpin the defined specific purpose of individual qualifications.

**Question B6.2**

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

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Not sure</th>
</tr>
</thead>
</table>

ii) If not, why not?

We were involved in discussions with the Welsh Government at the time of the introduction of the learning measure about the inflexibility of using 120 GLH as the size measure for vocational qualifications, thus discounting the use of smaller qualifications and undervaluing larger qualifications.

As such we do not support the linking of vocational qualifications to GCSEs and 120 GLH, as this fuels the danger that vocational qualifications will be artificially required to be designed to be the same shape and size as GCSEs. This renders them ‘mock GCSEs’ and means that the distinctive aspects of vocational qualifications are lost and the curriculum offer is the poorer.

We believe that it would be better to allow a wider range of qualification equivalencies which would accommodate smaller qualifications, and would give a proper value for larger qualifications.
iii) Do you agree with our proposal to continue to count qualifications that are smaller than a GCSE (for example, GCSE short course or vocational qualifications of similar size) in performance measures?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

iv) If not, why not?

question b6.3

i) Do you agree with our proposal to place a limit of 40 per cent on the contribution of vocational qualifications to the Level 1 and Level 2 performance measures?

| Yes | ☐ | No | ☒ | Not sure | ☐ |

ii) If not, what limit (if any) would you suggest, and why?

We would not wish to take a firm line on this matter, imposing a central limit naturally risks placing some learners at a disadvantage. However, we would strongly support the view that a solid general core must be at the heart of all 14-16 provision. We believe that any such limit risks disadvantaging learners who are better suited (for whatever reason) to a vocational route of achievement. Providers should be able to work with an individual learner to design the most appropriate programme of learning for them which will motivate the learner, engage them and support them in achieving their full potential. If a learner is more suited to vocational learning and can achieve meaningful qualifications with progression routes to HE or employment then they should be allowed to progress in this way without being constrained by a bureaucratic cap on the amount of time they can spend on vocational subjects.

iii) Do you agree with our proposal to maintain our current approach to discounting for identical or very similar qualifications?

| Yes | ☐ | No | ☒ | Not sure | ☐ |

The question is unclear.

iv) If not, why not?

question b6.4

i) How important is it to maintain the ability to make direct comparisons of school performance with England?
Questions B7.2

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

i) is 'fit for purpose'?

To a great extent ☐, To some extent ☒, Not much ☐, Not at all ☐, No opinion ☐

ii) influences the behaviour of centres in terms of the specific qualifications they choose for their learners?

To a great extent ☐, To some extent ☒, Not much ☐, Not at all ☐, No opinion ☐

iii) impacts on grades, standards or outcomes?

To a great extent ☐, To some extent ☒, Not much ☐, Not at all ☐, No opinion ☐

iv) impacts on the provision of Welsh-medium qualifications?

To a great extent ☐, To some extent ☒, Not much ☐, Not at all ☐, No opinion ☐

v) Can you suggest an alternative model which you think might be preferable to the current system?

City & Guilds is supportive of the FAB Wales proposal for a Curriculum Framework – see Annex A of the FAB Wales proposal.

vi) Please state whether your answers refer to general qualifications, vocational qualifications, or both.

Both vocational and general qualifications.
Questions B7.3

i) Do you have any views on the future of regulation and quality assurance of qualifications for 14 to 19-year-olds in Wales?

We point to the fact that the regulation of awarding bodies and qualifications has only just been significantly revised, including in Wales, and we would assume that this revision should be fit for purpose. In part this relates to the issue of divergence from England which is addressed in our answer to Question A.10.

ii) Should awarding organisations be allowed to deliver seminars to teachers in Wales?

| Yes | ☒ | No | ☐ | Not sure | ☐ |

** Please Note: Our attendees are in the majority tutors and trainers from FE and WBL.**

iii) If so, for what purposes should they be able to deliver seminars?

We feel there is a place for seminars/events/training/support, providing they:

- Have had their content checked prior to delivery to ensure it is appropriate and does not undermine in any way the integrity of the exam.
- Are not facilitated by examiners who have directly contributed to future exam papers in the subject area.
- Are supported by a robust quality assurance model by the AO to lay down the requirements for seminars and check to ensure these are adhered to (e.g. via observation, video checks etc.).
- Ensure that the information disseminated at the event is available via the AOs website for download by all centres to ensure that those present at the seminar are not unfairly advantaged.
- Are not priced at a level that make them inaccessible to a range of centres (if this is relevant) and likely to advantage those from financially buoyant centres. City & Guilds Networks and launches are free of charge, but Events and Quality Assurance Training are sometimes charged to cover associated costs.

iv) To what extent could, or should, the security of the present seminar system be improved?

By regulators using their regulatory powers to address any malpractice in seminar activity and publicising this to ensure all awarding bodies are aware of the type of activity that is not acceptable.

Additional comments

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 may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: