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Consultation – summary of responses

14–19 Learning Pathways policy: the way ahead

Date of issue: January 2014

14–19 Learning Pathways policy: the way ahead

Audience	Local authorities, governing bodies of maintained schools and institutions within the further education sector, headteachers of maintained schools and other interested parties.
Overview	This document outlines the responses received to a consultation on the future direction for the 14–19 Learning Pathways policy.
Action required	None – for information only.
Further information	Enquiries about this document should be directed to: Subject Support 7–19 Branch Curriculum Division Department for Education and Skills Welsh Government Cathays Park Cardiff CF10 3NQ Tel: 029 2082 5837 e-mail: 14-19@wales.gsi.gov.uk
Additional copies	This document can be accessed from the Welsh Government's website at www.wales.gov.uk/consultations
Related documents	Learning and Skills (Wales) Measure 2009 www.legislation.gov.uk/mwa/2009/1/contents <i>Learning and Skills (Wales) Measure 2009: Local Curriculum for Pupils in Key Stage 4 Guidance</i> (2012) www.wales.gov.uk/topics/educationandskills/pathways/learningpathwayspublications/learningandskillsmeasure/?lang=en <i>Learning and Skills (Wales) Measure 2009: Local Curriculum for Students aged 16 to 18 Guidance</i> (2010) www.wales.gov.uk/docs/dcells/publications/100715localguidanceen.pdf <i>14–19 Learning Pathways: The Review of Local Collaborative Provision at Key Stage 4</i> (2013) www.wales.gov.uk/topics/educationandskills/publications/reports/review-local-collaborative-provision-key-stage-4/?lang=en

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Introduction

The Welsh Government issued a consultation to gather views on proposals to change aspects of the 14-19 Learning Pathways policy.

The main proposals for change were commended to the Minister for Education and Skills by an independent Task and Finish Group. Evidence presented to the Minister for Education and Skills by the Group indicated that there is scope to improve equality across Wales in terms of Key Stage 4 (KS4) learning experiences. In particular, there are operational challenges for some schools and local authority areas in delivering wider choice under the current arrangements.

The Group's recommendations advocated a shift in the 14-19 Learning Pathways policy to take into account:

- a more appropriate balance between learner choice and the quality of learning options at KS4; and
- considerable changes that have taken place in the Welsh educational landscape over recent years.

The consultation specifically invited views on the implementation of the proposed policy changes, which will affect regulations, funding arrangements and 14-19 business planning and delivery.

The consultation was open from 4 November to 4 December 2013. A total of 10 questions were set out in a pro-forma style document, provided by an online form for ease of email return.

The Welsh Government received 31 responses to the consultation from the following organisations:

- Schools
- Trade Unions
- 14-19 Networks / Local Authorities
- Education Bodies
- Awarding Bodies
- Charities
- Sector Skills
- Individuals

A full list of respondents can be found at Annex A.

Summary of responses

Question 1: Would bringing forward new Regulations early in 2014 reducing the number of courses that must be included in the local curriculum offer from 30 to 25 with effect from September 2014 cause your organisation / school particular operational difficulties?

Although not all respondents agreed with reducing the minimum local curriculum offer, the majority were in favour and **all** agreed that this could be achieved. The comments in support cited the following as reasons for backing the new Regulations:

- More flexibility for schools.
- Timetabling issues should be resolved where, for example, pupils currently have access to more courses but fewer combinations.
- Schools will continue to offer relevant courses / maximise offer and 25 is only a minimum.
- With 30 courses, in some cases take up numbers were low and so were not always viable to run anyway.

7% of respondents indicated that this might cause operational difficulties for institutions from a planning perspective and that a phased approach would have been preferred. Other issues highlighted included:

- Whether there should be a specific number?
- The reduction should apply at KS4 and post-16. There may be implications if not – e.g. progression issues.
- The schools should be able to meet the new regulations, but it will lead to a reduction in the need for collaborative working arrangements for L2 provision.

Recommendations for the Welsh Government to consider in taking forward this proposal included:

- Ensuring funding is maintained to support successful partnerships.
- Monitoring the impact on disadvantaged learners carefully.

Question 2: Would bringing forward new Regulations early in 2014 reducing the number of vocational courses that must be included in the local curriculum offer from five to three with effect from September 2014 cause your school/organisation any operational difficulties or prevent you from providing the most appropriate balance of choice for your learners?

Respondents confirmed that this was deliverable; although a higher proportion compared with Question 1 (15%) were opposed and/or raised operational

issues. Some of the respondents noted that they would have preferred if more time had been provisioned to introduce these change. Other issues raised were in relation to the following points:

- Perception that the status of vocational qualifications is diminishing (in addition to reducing the minimum offer, respondents cited other policy developments, including the changes to the Welsh Baccalaureate whereby learners will only be able to select 2 vocational courses towards the qualification)
- Negative impact on pool of people the industry / employers can choose from.
- Less support for schools to provide a balanced curriculum.
- Impact on FE colleges, with fewer staff needed to deliver the curriculum and less need for collaboration.
- Risk of negative impact on disadvantaged learners or those who benefit from courses suited to their learning styles, which could in turn have implications for the number of learners achieving the L2 threshold.

There were some concerns highlighted, however, the vast majority were either in favour (44%) or neither agreed nor disagreed (41%). The supporting comments included:

- The flexibility to offer more than three courses remains. Several respondents indicated that they would continue to maximise the course offer if that is appropriate for their cohort of learners.
- Recognition that this presents less of a delivery challenge.
- Possibility that this could result in less pressure on school budgets.

Some of the prevalent recommendations in taking forward this proposal were:

- Welsh Government should consider imposing a requirement that these vocational subjects come from different areas to ensure a balanced offer.
- The need for clarity on definition of the term vocational and protection of the status of vocational qualifications moving forward.
- Suggestion that the Welsh Government undertakes an Equalities Impact Assessment, if not already completed.

Question 3: Would bringing forward new Regulations and changes to statutory guidance early in 2014, removing the requirement on schools and colleges at Key Stage 4 and post-16 to meet respective points scores when compiling the course offer for September 2014, cause your organisation/school/college any operational difficulties?

The responses were overwhelmingly in support of removing the local curriculum points scoring system. The respondents welcomed the removal of the administrative burden and the increased flexibility with course selection.

Only 3% indicated that this might cause operational difficulties due to the time frame. Another issue highlighted was the possibility that schools/colleges will drop 'higher scoring' qualifications.

Question 4: We propose to amend programme guidance to facilitate use of the Pupil Deprivation Grant (PDG) and School Effectiveness Grant (SEG) from 1 April 2014 to enable schools to use those resources more flexibly in meeting their learner support needs, particularly around the learning coach function (including staff training costs). Would bringing about such an early change cause your school/institution any operational difficulties? Are there any potential consequences you wish to draw to our attention?

The consultation responses indicated that there is considerable support for this proposal to be taken forward with only 11% confirming that they disagreed (although it should be noted that 48% neither agreed nor disagreed). The primary reason for disagreeing was because respondents considered that subsidising areas other than National and school priorities might jeopardise improvements or impinge on projects already established via SEG/PDG. Another concern related to this change was that it was seen to consolidate the notion that vocational education is only provided for certain groups of learners.

The comments endorsing the change included:

- Support for relaxation on the constraint of grant funding, coupled with increased accountability on spend.
- Flexibility to target where money can most usefully be spent contributing to overall improved strategic planning by schools.

There were, however, a number of caveats and recommendations put forward. These included the need/desire for:

- Revised guidance to be issued as soon as possible.
- Transitional arrangements.
- Monies ring-fenced for specific purposes and criteria, albeit within a more flexible framework of support.

Recommendations in taking forward this change included:

- Auditing local authorities to measure the impact.
- Where appropriate, devolving monies directly to schools.
- Research in to the effectiveness of the Learning Coach function.
- Increased flexibility but not so that money can be spent on unrelated or tangential priorities.

Some other concerns were related to funding and what happens beyond 2015-16 and issues with a lack of Welsh-medium skills in college staff.

Question 5: We propose to bring about greater strategic and integrated planning within consortia around school improvement and 14-19 delivery. Do you see value in enhancing that role at the Regional level? What issues would you like to see reflected in planning arrangements as they are developed over the coming months?

Respondents, overall, advocated enhancing the role at regional level (38% agreed; 50% neither agreed nor disagreed). There were some issues raised and these predominantly related to uncertainty about the effectiveness of the consortia. It was noted that consortia are yet to demonstrate that they can carry out their core functions, which casts doubts about enhancing their role at this time.

The concerns raised were countered to some extent by the supporting comments, which were focused on the opportunities presented by enhanced regional working. These included:

- Opportunity for critical functions to be enhanced, especially around the management and flow of data.
- Facilitation of the collaboration agenda, with integrated planning across a greater area.
- Reduction in the duplication of resource.

Recommendations included:

- Need to protect existing partnerships that are working efficiently.
- Exploration of regional working in relation to transportation for learners.
- Greater integration / linking with education bodies, such as GTCW, Estyn, Qualifications Wales, regeneration and skills.
- Appreciation of local factors when looking at provision.
- The reviewed statutory guidelines should make it clear what the role of the consortia is in relation to the Welsh in Education Strategic Plans, and how the consortia will consider their objectives in planning the local curriculum provision in future.

Question 6: The evolution of 14-19 grant funding to local authorities into a more harmonised funding arrangement to local consortia following the transitional year will likely involve moving from a funding allocation approach, to a more needs-drive allocation process, within overall budget limits. Do you agree with the development of a more needs-based, targeted approach to funding for schools/colleges? What issues/concerns would you like to see addressed in the planning guidance as it is developed over the coming months?

There was widespread support for this change **in principle**, with 48% in agreement; 48% neither in agreement or disagreement; and 4% in disagreement.

There were a number supporting comments with respondents backing the development of a unified funding system and increased transparency, which should lead to improved equity to learners and stakeholders. There were, however, reservations with a number of respondents concerned about how the formula or criteria of 'needs-based' funding would be decided and whether this would include factors such as linguistic need as well as FSM, local area deprivation etc. There was also concern that there might be a need for local financial assistance as well as regional, which could result in creating an extra tier of governance.

The consensus was that greater detail would be required about such a proposal before it could be implemented. Recommendations included:

- All funding decisions need to be fair and transparent. A possible solution is the organisation of a management board with senior leaders from schools, colleges and work-based learning providers contributing to decisions made.
- The criteria for establishing 'need' must be clearly defined, along with the data used.
- Local issues need to be addressed.

Question 7: Within local collaborative provision, are you aware of any effective examples of alternatives to learner travel currently in operation? Can you provide outline details, including whether there is a cost and/or learner benefit gained from this approach.

This question appealed for alternatives to travel and respondents highlighted that the move away from learner travel will necessitate more local provision, increased digital solutions or greater use of peripatetic teachers. In respect of digital solutions it was recognised that this would be reliant on continued investment in equipment, support, supervision and infrastructure.

Other suggestions included shared delivery between college and schools to reduce costs and the development of qualifications that are designed to be delivered in school workshops without the need to invest significantly in buildings or equipment. It was also suggested that an option would be to

encourage learners to be more independent and to use public transport, if appropriate.

Opinions were divided about learner travel with some respondents considering travel to be unsustainable and a deterrent for learners when choosing their options and others in favour of travel, citing the importance of learners accessing specialist equipment often required for vocational courses as the main benefit.

Question 8: Given the need for continued emphasis on the provision of appropriate vocational course options at Key Stage 4, with a view to learner progression on vocational learning post-16, do you see potential value in the development of more broad-based vocational qualifications? How do you feel such developments would benefit Key Stage 4 learners. How do you consider they would best be developed?

The responses demonstrated that there was some appetite for the development of more broad-based vocational qualifications, although the majority (54%) neither agreed nor disagreed.

The supporting comments were predominantly related to recognition that this would complement the move to IVETs/CVETs with broader based qualifications helping to ensure that KS4 learners would not be narrowing their options. Some comments also welcomed development of new courses to both create relevant courses and raise the status of vocational qualifications, which considering wider developments, were considered in danger of being undermined. Other comments were that this could provide a clearer progression route at post-16 and facilitate collaboration.

There were some respondents who were opposed to the proposal given the proliferation of vocational courses already available. There were also concerns about funding; how this fits with an increased focus core subjects due to the L2 inclusive performance measure; loss of practical content, which could increase the rate of disengagement within KS4, and the need for continuation of some specialised courses – e.g. Construction

A number of recommendations were put forward and these included:

- Need for further evidence on the effectiveness of broad-based qualifications in promoting progression and the value placed on broad-based qualifications by employers and post-16 providers.
- Suggestions for development included: developing on a local level with accreditation by Qualifications Wales; IVETs should not lose completely some of the more practical elements of the course; need to link to gaps in the employment market; need to ensure direct progression to L3 courses post-16.
- These qualifications should be developed to mesh with the revised WBQ core requirements and to develop further both a positive understanding of vocational qualification choices at 16 and the

contextualisation of generic skills in enterprise and employability that will support progression into work.

- Any programme based on a 'broad-based vocational qualification' should involve a significant amount of work experience.

Question 9: Recognising the various policy developments taking place around the education of 14 to 19-year-olds in Wales, do you consider there is a need for changes in the communications approach of the Welsh Government? How do you think we can best achieve a more joined-up approach to our messages?

The majority of respondents considered that due to the vast array of changes being made in education, there needs to be improved connectivity of all policy developments so that stakeholders to fully understand the interaction between all strands of current educational policy development.

Some positives in existing communication approaches were noted, which included improved communications since the launch of Learning Wales and commendation of the model being used by those in charge of the communication strategy for Qualifications Wales.

The recommendations for future communications included:

- All communication needs to be delivered via one source.
- Parity between vocational and academic courses needs to be developed and clearly communicated.
- Learners (and their parents) should be placed first in any communication strategy.
- Need to create a greater common understanding and consistency of message among the professional community both those within Welsh Government and those across the educational community.
- Welsh-medium courses should not be overlooked in the communication strategy.
- Need to engage with all parties involved in 14-19 provision, in order to establish a common understanding of the funding mechanisms, the construction of the course offer and viability of the provision on offer.
- Welsh Government should consider a range of strategies to ensure that accurate information is disseminated and best practice is shared widely, including: events; learning packs for practitioners and consortia representatives; bank of on-line resources for practitioners and consortia representatives; use of the Hwb and Learning Wales as platforms for providing good practice and resources; media campaigns; information packs that can be used by schools to inform parents and learners.

Question 10: We have asked a number of specific questions. If you have any related issues which we have not specifically addresses, please use this space to report them.

The comments covered a range of issues with some related to the future direction of the policy as well as wider policy developments. Some of the issued raised by respondents included:

- Need for consolidation and Wales to develop a long term strategic plan, taking account of the competing demands for different reforms on the Key Stage 4 curriculum;
- Issues with collaboration, including competition between FE and schools and between individual schools remaining and issues with monitoring student progress and impact across institutions;
- Need for developments within the 14-19 Learning Pathways landscape to take due regard of developments post-16 and better information advice and guidance for learners when considering their options.
- Importance of positive and productive interaction between organisations delivering youth support services and formal education institutions

In terms of funding, views included:

- Concerns with regards to the 14-19 grant and the impact this will have on the learners (especially post-16).
- Support for the use of specific grants or the ring fencing of revenue funding for specific periods of time on the understanding that funding will eventually return to the RSG.
- Need for Welsh-medium to be considered central to the policy in funding terms rather than additional.

Welsh Government response

The Welsh Government welcomes the responses received to the consultation and officials have taken them into consideration, in conjunction with relevant policy impact assessments, in bringing forward the Regulations.

The overall response was in favour of proposals with no major operational difficulties raised and it is intended that the Regulations will be laid as soon as possible with effect September 2014. The changes to the Regulations will include:

- reducing the number of courses that must be included in the local curriculum offer from 30 to 25 at Key Stage 4 (KS4);
- reducing the number of vocational courses that must be included in a local curriculum offer from five to three at KS4;
- removing the requirement on schools and colleges at KS4 and post-16 to meet respective points scores when compiling the course offer; and
- removing restrictions, in terms of the domains, currently applied in the selection of vocational courses at KS4.

The decision to remove the restrictions in terms of domains follows discussions with the 14-19 Regional Networks, consultation responses and other correspondence.

Some respondents were of the opinion that the reduction to the minimum number of courses that should form a local curriculum offer should also apply at post-16. However, the National Assembly's Children and Young People Committee, following their inquiry into the Learning and Skills (Wales) Measure 2009, raised no issues with regard the post-16 curriculum offer. Consequently, it was not included in the remit of the Task and Finish Group who undertook the [review of local collaborative provision at Key Stage 4](#).

The Welsh Government notes the concerns about the timescales for introducing the changes. However, considering the proposal is to reduce the requirement this should not be problematic. In planning terms, there has been regular communication with schools via 14-19 Networks, Dysg newsletter and Learning Wales about the recommendations put forward by the Task and Finish Group and the intention to consult on these changes. In addition, a link to the consultation was added to the Database of Approved Qualifications in Wales (DAQW) website to inform curriculum planners of the proposed changes. Schools and further education colleges are required to record their local curriculum offer on Careers Wales Online and the reporting area of the site for 2014/15 has remained closed pending the outcome of this consultation.

The rationale for 25 as the new minimum is substantiated by the 2012/13 offer data, which showed that 26.1 was the lowest average number of courses taken up in a local authority area. As a consequence, 25 should be a viable

number which still ensures adequate choice. In respect of concerns around the impact of reducing the local curriculum offer, the intention is to remit Estyn to review the quality and impact of sample offers at KS4 and DfES officials will also consider how the policy impact can be more widely measured. It should also be reiterated that 25 is the minimum number of courses and schools can continue to offer more if that is in the best interest of the learners.

Comments in relation to the move to a more needs-based approach to funding will be considered in more detail and any changes will be communicated to stakeholders before they are implemented. Similarly, comments in relation to the use of PDG/SEG resource for 14-19 activities as well as the suggestions for more sustainable alternatives to travel will be considered as guidance documents are developed over the coming months. If the proposal to use PDG/SEG funds for learner support needs is approved, the impact is not anticipated to be significant. Since 2009 the Welsh Government has provided funding for a number of Learning Coaches to be trained and accredited through the Credit and Qualifications Framework for Wales (CQFW) and data shows that at present all schools / FE institutions have sufficient Learning Coaches in place. In response to a concern about whether or not the Learning Coach function is the most effective use of funding, Estyn are presently undertaking an evaluation of learner support services, and this will be revisited once the outcome of the review is known.

The feedback in relation to enhancing the regional role is useful and will be shared with relevant policy leads as the new National model for regional working is implemented over the coming months. The Minister for Education and Skills recently issued a written statement on progress to date and forthcoming plans to ensure that the National model will be operational from April 2014. The statement can be accessed via the following link:

<http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-written-ministerial-statements.htm>

The comments relating to the development of more broad-based vocational qualifications will be considered by the Qualifications and Regulation Division within DfES. The Division is currently establishing a Sector Qualifications Advisory Panel, containing both sector representatives and practitioners, and officials will use these panels to guide them.

Welsh Government recognises that based on feedback there needs to be a more strategic, joined up communications approach and this will be a key consideration as changes are taken forward.

Full list of respondents

1. Cardiff 14-19 Network
2. Ceredigion 14-19 Steering Group
3. 14-19 Pathways Rhondda Cynon Tâf
4. Merthyr Tydfil County Borough Council
5. Welsh Local Government Association (WLGA)
6. Grŵp Llandrillo Menai
7. Colegau Cymru
8. Construction Industry Training Board (CITB) Cymru Wales
9. Agored Cymru
10. Pearson
11. Fitzalan High School
12. Treorchy Comprehensive School
13. Ysgol Gyfun Rhydywaun
14. Ysgol Gyfun Gymraeg Bro Eder
15. Ysgol Maesydderwen
16. Joint Governing Committee Ysgol Gyfun Cwm Rhymni and Ysgol Gyfun Gwynllyw
17. School Data Partnership South East Wales (Ysgol Gyfun Gymraeg Bro Eder, Ysgol Gyfun Bryntawe, Ysgol Gyfun Cymer, Ysgol Gyfun Cwm Rhymni, Ysgol Gyfun Gwynllyw, Ysgol Gyfun Llangynwyd and Ysgol Gyfun Rhydywaun)
18. Governors Wales
19. Careers Wales
20. Comisiynydd Plant Cymru Children's Commissioner for Wales
21. Estyn
22. Mentrau Iaith Cymru
23. Welsh Language Commissioner
24. National Association of Schoolmasters Union of Women Teachers (NASUWT)
25. National Training Federation Wales (NTfW)
26. National Union of Teachers (NUT)
27. Association of Teachers and Lecturers (Cymru)
28. Undeb Cenedlaethol Athrawon Cymru (UCAC)
29. University and College Union (UCU) Wales
30. Stephen Williamson
31. Respondent wished to remain anonymous