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Consultation – summary of responses

Our qualifications – our future

Consultation on proposals to establish a new qualifications body for Wales

Date of issue: June 2014

Our qualifications – our future

Audience	The general public.
Overview	This document contains the results of the consultation about the establishment of a new qualifications body in Wales.
Action required	None – for information only.
Further information	Enquiries about this document should be directed to: Claire Habberfield Legislation Team Department for Education and Skills Welsh Government Freepost NAT 8910 Cathays Park Cardiff CF10 3BR Tel: 029 2082 6893 e-mail: qualificationswales@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	<i>Our qualifications – our future</i> (2013) Consultation on proposals to establish a new qualifications body for Wales

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Executive summary

Summary of formal consultation

A formal consultation paper, *Our qualifications – our future: Consultation on proposals to establish a new qualifications body for Wales*, was published on 1 October 2013, and closed to responses on 20 December 2013. Overall there was very strong support for the establishment of an independent regulator or quality assurance body outside of Government.

There were strong reservations, concerns and some opposition to the inclusion of awarding responsibilities in the remit for Qualifications Wales. Responses particularly stressed the need for a clear separation of duties if awarding powers were enacted to avoid conflict of interest.

There were also concerns from Awarding Organisations in particular about the 'single suite' of qualifications in terms of reducing choice for learners and limiting the incentives for innovation.

It was strongly emphasised by many that whatever system evolved, qualifications developed in and for Wales must be portable, be of high quality and have cross-border currency in the UK and Europe. Qualifications with common titles such as GCSE and A level, even if divergent in structure, must be comparable in standards and have equal value in the eyes of stakeholders in order to support learner mobility and progression into Higher Education (HE) and employment.

Strong support was expressed for the proposed high level of stakeholder engagement for Qualifications Wales and encouragement to continue to engage with other regulators including The Office of Qualifications and Examinations Regulation (Ofqual). It was also emphasised by some respondents that Qualifications Wales should engage fully with other national bodies in Wales such as Estyn and the General Teaching Council for Wales (GTCW) and that there is a need for clarity on the relationship between curriculum and qualifications and the need for coherence as well as stability.

There was strong support for the Welsh Baccalaureate as the flagship qualification for Wales as well as strong support for Qualifications Wales to take on responsibility for Apprenticeships. It was also noted that Qualifications Wales need to be inclusive and ensure high quality qualifications for all learners, including those with disabilities.

Many respondents from a range of stakeholder groups are keen to be involved in future developments and expressed their commitment to working collaboratively with Qualifications Wales as the organisation develops in order to ensure a transparent and robust qualifications system.

Further detail of the responses to the consultation follows at Part 1 of this document.

Summary of engagement activity with children and young people

The proposals for Qualifications Wales were generally seen as a very positive development for the future of education in Wales, with particular praise for the increased fairness and simplicity of the system.

Participants also commented positively on the potential benefits for Welsh speakers, the increased confidence that will be encouraged by improved quality and the greater ease with which students will be able to move between schools in Wales.

Alongside these perceived advantages, participants also expressed many concerns about the way in which the new system is introduced and managed.

Further detail of the responses to the engagement activity with children and young people follows at Part 2 of this document.

Common themes in both sets of responses

Themes common to the responses to both consultation activities are:

- the need to strengthen public confidence,
- the need to ensure that transitional arrangements are sound,
- the ongoing portability of qualifications, and
- the independence of the new organisation.

Broadly, the formal consultation respondents supported the proposals in the consultation document, but respondents to the online consultation expressed significant concerns about the perceived conflict of interest in performing both awarding and quality assurance functions.

Acknowledgements

We would like to take this opportunity to thank everyone who responded to our consultation and participated in our engagement workshops for their contributions.

1. Formal consultation

1.1 Background

In November 2012, the *Review of Qualifications for 14 to 19-year-olds in Wales* recommended that the Welsh Government should establish Qualifications Wales to be the single body responsible for the regulation and quality assurance of non-degree qualifications in Wales, and, in time for the development and awarding of most general qualifications in Wales.

The Welsh Ministers approved this recommendation and have undertaken the first steps to carry it out through publishing the formal consultation, *Our qualifications – our future: Consultation on proposals to establish a new qualifications body for Wales*, on 1 October 2013. The purpose of this consultation was to elicit views from stakeholders of the issues arising from the proposal.

The consultation document posed the following questions to stakeholders:

The case for change

1. Are there any other barriers to the effectiveness of the current system, or are there any other weaknesses?
2. Are there any specific features in the current system that you would like to see changed?

Our Vision

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

How we will achieve our vision

4. What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales?
5. What are your views on the proposed governance arrangements for Qualifications Wales?
6. What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right, or should it have a different remit?
7. What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales?
8. How, and to what extent, do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders?

The consultation period ended on 20 December 2013. A summary of the responses received to that consultation is presented in the following chapters.

Copies of responses received, save for those who have requested confidentiality can be viewed in their original format and language at: <http://wales.gov.uk/consultations/education/our-qualifications-our-future>

1.2 Methodology

The consultation asked participants to respond to 9 open-ended questions relating to sections 3 to 5 of the consultation document. 62 responses were received. Responses were detailed, and raised a number of issues relating to Qualifications Wales as an organisation as well as issues relating to qualifications in a more general sense.

Most respondents addressed the questions as set out in the consultation questionnaire, however a small minority responded in letter format or by simply listing issues relating to their own organisation.

The results were analysed as a whole and also broken down to identify issues relevant to particular stakeholder groups, for example awarding organisations, schools and colleges, HE organisations and institutions, teaching associations, local authorities and national organisations both Wales-specific and UK wide.

1.3 Summary of respondents

A total of 62 responses were received. The following tables provide breakdowns of this number into types of respondents.

Awarding Organisation	15
Teacher Association	7
Sector Skills / Business / Employers	9
Local Authority	3
School / College	2
Higher Education	6
Further Education	6
Student Voice	2
National Body	6
Individual Response	6
Total	62

Wales-only responses	36
Welsh response with UK interest	1
Non-Welsh response with UK interest	25
Total	62

1.4 Summary analysis

The case for change

Throughout the responses to the consultation there was overwhelming agreement that there is a need for a qualifications system that is responsive to Wales. The vast majority of respondents also agreed that there is a clear case for the establishment of a single national independent body to be responsible for the regulation and quality assurance of qualifications in Wales.

'The proposal to establish Qualifications Wales as an independent regulator that is answerable to the National Assembly is very welcome. Over time, this new body could indeed become authoritative in its dealings with government and other stakeholders. This will be necessary to ensure public confidence in the qualifications system emerging in Wales.' (ASCL Cymru)

However, many also emphasised the need to ensure that the interests of Welsh learners are protected, in particular in relation to the portability of qualifications.

'The principle of simplifying the qualifications system in Wales is understood and is a laudable aim. But any new system must be robust and capable of comparison with qualifications in place across the United Kingdom, and elsewhere, so that Welsh learners are able to compete on an even playing field with those seeking work or further and higher education places outside of Wales.' (WLGA)

The consultation document identifies a number of barriers to effectiveness within the current qualifications system. These include: competing awarding organisations; conflicting priorities across the current three country system and the limited capacity to address Wales-only issues including continuity and coherence with the curriculum in Wales. Most respondents agreed that these are barriers and many identified further barriers, for example: inconsistencies in the interpretation of current regulations; further barriers for learners with disabilities; a general lack of understanding of vocational qualifications and the proliferation of qualifications. It was also observed by some that there is currently a lack of cohesion between the curriculum and the qualifications system which does not support a smooth and integrated programme of learning.

'..there is clearly a need to dovetail the design and aims of qualifications with the revised curriculum at Key Stage 4 and below. The experience for post-16 learners should be one that naturally develops from their experience of, and attainment in, school allowing progression pathways to be properly joined up.' (Coleg Gwent)

A small number of respondents did not agree that there was evidence to support some of the barriers identified. In particular they asserted that the system of multiple awarding organisations creates choice for learners and opportunities for innovation and that there is a lack of evidence to establish the 'relative ease' of different qualifications. It was also questioned whether Qualifications Wales would be able to offer the range of general qualifications which are currently available. One teaching association also noted that common qualification frameworks supported the mobility of the teacher and school leader workforce.

Respondents were asked to identify what they would like to retain from the current system. Many identified areas relating to qualifications, with over half insisting that whatever system is established, the portability and currency of qualifications across borders is of paramount importance for learner mobility and progression into higher education and employment. (The detail of issues raised in relation to qualifications can be found in annex 2). About a third of respondents also were in favour of retaining multiple awarding organisations, believing that competition allows breadth and choice in order to meet learner needs and encourages innovation. There was also support for continued collaboration with other national organisations such as Estyn and GTCW, awarding organisations and other regulators including Ofqual. Many of the organisations with a focus on vocational provision voiced support for the retention of the National Occupational Standards (NOS) and Credit and Qualifications Framework Wales (CQFW).

'The issue of the portability of qualifications, particularly between England and Wales is of the utmost importance. The Federation respects the need for qualifications in Wales to meet the specific needs of Welsh learners and providers but would encourage Qualifications Wales to seek to balance this with the needs of learners in relation to the portability of qualifications across the UK and further afield.' (FAB)

'It is vital that qualifications in Wales are both portable and valued elsewhere in the UK. Although a different system seems to be emerging, we believe it is paramount for Welsh Government to continue to work with its counterparts across the UK to minimise potential impact and ensure parity.' (Skills Active)

The vision for Qualifications Wales and how it will be achieved

The vast majority of respondents supported the broad vision for Qualifications Wales to:

- simplify and professionalise the qualifications system;
- scrutinise, evaluate and improve qualifications within that system;
- support and engage with stakeholders;
- strengthen public confidence in, and information about, qualifications in Wales; and
- supply high quality qualifications to learners in Wales.

'The vision outlined in the document is well thought through and credible. It sets out a regulatory structure and wider approach that should equip Wales well for the future. It will retain the strengths of the current system while adding key functions such as quality enhancement that should allow Wales to take forward important strands of work ensuring that qualifications in Wales are relevant, up to date in subject content, well structured in educational terms, and suited to the needs of employers and higher education providers in Wales and beyond.' (Colegau Cymru)

However, there were also strong reservations and concerns relating in particular to the inclusion of awarding responsibilities in the remit for Qualifications Wales. A small number of respondents welcomed the vision only in relation to Qualifications Wales as an independent regulator and were explicitly opposed to the awarding function. An even smaller number rejected the vision entirely.

Another major reservation expressed was the risk that the creation and vision for Qualifications Wales would endanger the portability and currency of qualifications developed in and for Wales.

'...it is vital that the emergence of a single body and single awards do not create a 'one-size-fits-all' qualifications offer that will deter rather than engage those most in danger of disengagement or which might create barriers to the gateways of higher educational providers beyond Wales.' (NAHT Cymru)

Reservations or concerns expressed by respondents outlined in response to questions 4 and/or 6 largely related to how Qualifications Wales would exercise its functions at an operational level. The majority of respondents broadly agreed that the nature and extent of the proposed activities and functions appear compatible with achieving the vision for Qualifications Wales, and that the proposed scope and functions of Qualifications Wales are also broadly appropriate. A small number did not think the scope and functions appropriate.

From those who agreed that the proposed scope, functions and activities are appropriate, a large number emphasised the need to make absolutely transparent the demarcation between regulation and awarding and to have robust measures for quality assurance in order to avoid accusations of conflict of interest. In some cases it was suggested that further consultation would be required for this area. There was also strong support for the phased implementation of the functions.

'On the operational level, Qualifications Wales will have to exercise its discrete functions (gate keeping, review and quality assurance, awarding qualifications) in ways that give confidence that there is no conflict of interest for the organisation.' (Colegau Cymru)

There was very strong support for engagement with other national bodies, including Estyn and GTCW, as well as full collaboration with other regulators, including, for example, a formal agreement with Ofqual. The need to engage with employers was also emphasised, not just within Wales, but outside Wales and those that crossed borders.

Some concerns were raised in relation to the proposed functions and activities of Qualifications Wales and vocational provision, including a possible reduction in the breadth of qualifications offered and a reduction in the mobility of learners if requirements were too Wales-specific. Some also urged that engagement with professional bodies that span the UK should not be jeopardised, so that learners in Wales would still have access to the full range of professional qualifications. Overall there was also a request for further clarity in relation to the regulation of vocational qualifications, work based learning and Apprenticeships.

The governance of Qualifications Wales

The majority of respondents thought that the proposed governance arrangements for Qualifications Wales were broadly appropriate. One respondent thought the arrangements were not appropriate, adding a layer of ‘*additional bureaucracy and cost*’. Some respondents expressed reservations or concerns and some made suggestions for additions or increases in emphasis within the proposed arrangements. The remainder did not express an opinion or did not respond to the question.

The most common concern expressed by a number of respondents was again the necessity for transparency and clarity in relation to the arrangements for the dual functions of regulation and awarding. Most respondents were happy with the accountability and independence in relation to Qualifications Wales as a regulator, but expressed concerns in relation to the awarding function and how the potential conflict of interest would be managed. Some respondents continued to make the case for the separation of these functions.

‘The governance arrangements will need to reflect separation of the regulatory and awarding functions of Qualifications Wales. For this purpose, it may be appropriate to have different reporting structures, cost centres and lines of accountability to deal with the separate functions that it will exercise.’ (Llandrillo Menai)

It was pointed out by one respondent that, while the proposed arrangements are entirely appropriate for the immediate functions of Qualifications Wales, in the long term, as it takes on its awarding functions, appropriate governance arrangements will be more challenging to establish. There were also concerns expressed by some respondents in relation to the impact of Qualifications Wales offering services outside Wales and how to avoid a conflict between commercial and regulatory interests.

A small number of respondents questioned how truly independent Qualifications Wales would be if its remit came from ministers and it was funded by Ministers. Analogies were drawn with Ofqual's arrangements with Parliament. A number of respondents were also concerned that the Qualifications Wales board should adequately reflect its stakeholders and include a wide representation. It was also suggested that the Chair be appointed on a fixed-term basis

Strengthening public confidence

Most respondents agree that there would be public confidence in Qualifications Wales as a robust and independent regulator with transparent procedures and clear lines of accountability.

'Establishing Qualifications Wales as an independent body that reports to the National Assembly will contribute to building public confidence in the qualifications system and its outputs.' (ASCL Cymru)

However, many are expressed concern that the dual role of regulator and awarder may appear to be a conflict of interest and thereby reduce confidence in qualifications. A common theme in many responses is that Qualifications Wales should have a clear and strong communications strategy from the beginning, including the planning for transition from one system to another, and this should be maintained as its role develops.

It was also suggested that Qualifications Wales should:

- work with partners that already have public confidence.
- fully engage with stakeholders in a transparent and open way and work in partnership with organisations within Wales as well as other parts of the UK;
- communicate the value that Qualifications Wales brings to the qualifications arena and demonstrate how it adds value over and above the current regulatory arrangement, including how it delivers value for money;
- ensure that qualifications in Wales are high quality, recognised and portable and that learners are safeguarded as they move from one system to another;
- develop a research base and use a range of evidence, including data to support development, decisions and comparability of standards;
- ensure that too great a divergence from a shared understanding of UK qualification 'brands' does not disadvantage Welsh learners' access to HE and employment; and
- promote the full range of high quality qualifications that are available in Wales and demonstrate how these provide a cohesive progression route for learners. (This should include qualifications that are not directly awarded by Qualifications Wales.)

'In headline terms Qualifications Wales will need to assure the public in Wales and elsewhere, especially England where many of our learners are destined, that our qualifications are as good as anywhere else in the UK. This will demand a twofold approach: firstly, they have to be in fact and verifiable as such by impartial external observers; secondly, they must be seen to be so, especially when under the glare of the media. The media strategy of the new organisation will need to be carefully worked out and must contain risk analysis. It should also contain means for rebutting claims that qualifications in Wales, because they contain elements of content and means of assessment no longer in place in England, are as rigorous as their counterparts.' (ATL Cymru)

Impact on stakeholders and learners

A number of responses noted the positive impact the proposals would have in Wales through the creation of an independent regulator. There would also be a positive impact for learners with a simplified system that maintains continuity and retains key features of the current system. One respondent welcomed the impact on employability through a renewed focus on literacy, numeracy and employability skills.

'...learners will benefit considerably from having a qualifications system that helps:

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

One awarding organisation suggested that those offering graded examinations in for example, ballet, music and dance would see the creation of Qualifications Wales as an opportunity to engage more productively with this type of assessment and to provide them with a coherent position within the qualifications landscape in Wales.

However, some respondents identified possible risks to learners and their own organisations. Most awarding organisations were concerned that there would be unintended consequences through the creation of Qualifications Wales that might have a negative impact for learners as well as their own organisations. These included an increased burden of regulation with the creation of another regulatory body, as well as difficulties and cost implications in the development of qualifications specifically for Wales.

This could lead to a possible reduction in the breadth of vocational qualifications available to learners in Wales if awarding organisations have to withdraw from the market.

There might also be a reduction in the mobility of learners in Wales if qualifications are too Wales-specific or if there are fewer qualifications available, resulting in a disadvantage for Wales-based learners who may find that their progression routes are reduced. Two awarding organisations stated that they would be reviewing their offer in Wales in the light of these perceived difficulties. A negative impact was identified for work based learning providers who work across borders, if the requirements for Wales were too different.

Other respondents were also concerned that the breadth of choice for Welsh learners would be reduced, including a number of colleges. One college summarised the risk as follows:

'Wales is only a small country and careful consideration would need to be given to the approval process for securing the right to offer accredited, funded provision here. There is a danger that if the constraints were too onerous, or different to those of our fellow UK countries, AB might be inclined to forego gaining approval as the time and costs exceed the potential income. This could seriously disadvantage small groups of learners in Wales and possibly result in them undertaking their further education in England, where the extended Welsh curriculum (bilingualism and the culture of Wales) would not be included.'

Other risks identified for learners included the lack of portability of qualifications and the impact of developing branded qualifications that differ significantly from other UK countries. This could impact negatively on access to HE.

Three teaching associations identified increased workload issues associated with the proposals and the need to address these early in the process, particularly in the light of other changes taking place in schools.

In order to minimise risk and support the development of a strong and robust qualifications system in Wales, in response to the last question, many respondents expressed their desire and commitment to working collaboratively with Qualifications Wales in the future as its role develops.

Additional points raised in responses

Further to the thematic summaries above, the following additional points were received for each question:

Question 1

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

A number of respondents described additional barriers that they came across in their particular areas of work which included:

- inconsistencies and lack of clarity currently in the interpretation and application of regulatory requirements across England and Wales, in particular relating to the General Conditions of Recognition for small awarding organisations;
- a general lack of understanding of vocational qualifications, particularly in relation to IVET and CVET;
- the use of qualifications in performance measures which can mitigate against the learner;
- further barriers for learners with disabilities, who one respondent described as being 'especially poorly served';
- the difficulty of changing institution mid-course if a different awarding organisation is used;
- the domination of the English market for awarding organisations;
- the fact that the Welsh Bac is not sufficiently understood outside Wales;
- the current systems do not favour e-learning and assessment;
- the lack of protection of intellectual property rights in the development of qualifications;
- political bias and interference; and
- lack of bench marking post -16.

Question 2

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

Responses included wanting to retain:

- the AS level as part of the A level and elements of non-terminal assessment (noted in particular in college and teacher responses);
- NOS and employer involvement and engagement in qualifications (noted in particular by vocational awarding organisations and SSCs);
- CQFW and its relation to the QCF (noted in particular by vocational awarding organisations and SSCs); and
- the strong collaborative and consultative approach in its dealings with AOs.

Question 3

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

Whilst the vast majority of respondents approved the broad vision for Qualifications Wales, reservations included:

- the possible confusion of qualifications with the same title but different criteria unless cross border collaboration was maintained;
- the possible extra cost and burden to awarding organisations in developing Wales-specific qualifications, or having the same qualification adapted for different countries. This was also identified as a risk if awarding organisations decided that to offer Wales-specific qualifications was not cost efficient, thus reducing the breadth of qualifications available to Welsh learners;

- engagement with professional bodies that span the UK should not be jeopardised to ensure Welsh learners have access to the full range of professional qualifications; and
- continuous improvement should not mean continuous change and that Qualifications Wales should maintain stability in qualifications developments.

The reasons given by those actively not supporting the vision were very similar to those given in question one where the respondents do not perceive any need for change to the current system. It was also questioned by one respondent whether Qualifications Wales would be truly independent. Another respondent noted that there was an over emphasis on certain qualifications in the vision and that the vision was not sufficiently inclusive.

A small number of organisations noted additions they would like included in the vision or remit for Qualifications Wales, including the need to engage with trade unions representing the education workforce, a reference to Welsh language and Welsh medium qualifications in paragraph 4.2 and that 'active consideration of designing qualifications, curriculum and learning programmes to meet the needs of young people from each protected characteristic (equality) group form part of the founding principles and duties of Qualifications Wales.'

Question 4

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

Whilst the majority of respondents agreed that the proposed activities and functions are appropriate, reservations not noted in the main body of the report above included:

- a lack of clarity about the relationship between Qualifications Wales and the WJEC;
- opposition to a regulatory body raising income from quality assurance activities;
- a lack of clarity relating to Qualifications Wales' activities outside Wales;
- a concern that Qualifications Wales was selecting the qualifications it would deliver based on cost and size of candidature rather than the needs of learners and that there should be clear criteria for which qualifications would be awarded and which would be regulated.

Question 5

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

No additional detail.

Question 6

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

Whilst the majority of respondents agreed that the proposed scope and functions are appropriate, concerns not noted in the body of the report included:

- the focus on regulating qualifications rather than awarding organisations could be challenging and have resource and capacity implications;
- insufficient clarity on the regulation of vocational qualifications as well as recent UK government policy relating to NOS and Apprenticeships;
- concerns around funding - both of Qualifications Wales and the impact on schools and colleges.
- a number of respondents did not support a regulator charging for QA services; and
- concerns with the concept of Qualifications Wales regulating its own qualifications and wanted clarification about how this would be done.

Some respondents noted additional functions that might be included in the Qualifications Wales remit, for example:

- Qualifications Wales be the 'gatekeeper' for Apprenticeships;
- all qualifications provision should be available bilingually and an increased focus overall on Welsh medium; and
- Qualifications Wales could carry out thematic reviews similar to Estyn.

Question 7

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

Other responses suggested that, Qualifications Wales should:

- ensure there is parity of esteem between general and vocational qualifications;
- develop qualifications that are clearly comparable with those in other parts of the UK and in Europe;
- map qualifications to other frameworks in order to support the mobility of learners;
- consider carefully how it can ensure that qualifications which are 'common' between Wales and England (such as GCSEs and A-levels) command confidence when they differ in key structural elements; and
- ensure there is sufficient incentive for awarding organisations to innovate and develop qualifications that fit the changing needs of learners in Wales.

Question 8

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

No additional detail.

Question 9

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

Just under half of the respondents responded to this question. Many used this question to indicate their willingness for future engagement and collaboration with Qualifications Wales as it develops. Others requested further clarity on issues such as quality assurance, qualification specific issues, and the regulation of vocational qualifications. The need for clear communication, including with parents was also emphasised.

Qualifications issues

In responding to the consultation many respondents raised important issues relating to qualifications rather than the establishment of Qualifications Wales as an organisation.

Many respondents emphasised the importance of the portability and currency of qualifications developed for Wales across borders, and that even where there was divergence from England for example, there must be comparability of standards and equal currency.

There was also strong support for:

- the continuing provision and development of qualifications through the medium of Welsh;
- retaining existing brands such as GCSE and A level;
- the retention of the AS level as part of the A level;
- retaining elements of non-terminal external assessment;
- the Welsh Baccalaureate as the flagship qualification for Wales, including its development at Entry level;
- developing the potential of e-assessment;
- a stronger emphasis on STEM subjects;
- benchmarking qualifications against European and international frameworks; and
- parity of esteem for general and vocational qualifications.

Although some respondents were not in favour of qualifications in Wales diverging from those in England, those that did not reject divergence, in particular in relation to AS and A level, insisted that the qualifications must be comparable and recognised.

1.5 List of respondents

AO	Awarding organisation
TA	Teacher Association
SBE	Sector Skills/business/employers
LA	Local Authority
SC	School/College
HE	Higher Education
FE	Further Education
SV	Student voice
N	National body
I	Individual response

1. SBE	UK Commission for Employment and Skills
2. AO	Open College Network
3. LA	Merthyr Tydfil County Borough Council
4. N	The Quality Assurance Agency for Higher Education
5. AO	AQA
6. SBE	CITB Cymru Wales
7. AO	Excellence Achievement and Learning [EAL]
8. HE	<i>ifs</i> University College
9. SBE	National Training Federation for Wales [NtFW]
10. FE	Neath Port Talbot College [NPTC Group]
11. AO	Pearson
12. AO	WJEC
13. N	Institute of Physics
14. AO	Agored Cymru
15. LA	The Welsh Local Government Association [WLGA]
16. HR	Cardiff University
17. SC	Fitzalan High School
18. LA	Conwy Education Services
19. N	CYDAG
20. HE	HEFCW
21. SC	St David's Catholic Sixth Form College
22. TA	NASUWT
23. AO	OCR
24. FE	Coleg Gwent
25. TA	NAHT CYMRU
26. FE	Colegau Cymru
27. SV	Coleg Cambria Student Voice
28. FE	Grŵp Llandrillo Menai
29. AO	British Institute of Innkeeping Awarding Body
30. TA	UCAC
31. HE	Aberystwyth University
32. SBE	Learndirect Cymru
33. AO	CACHE
34. AO	City & Guilds
35. N	Welsh Language Commissioner
36. AO	Federation of Awarding Bodies
37. SBE	Skills Active
38. TA	The University and College Union
39. SBE	The Institute of the Motor Industry

40.AO	GQA Qualifications
41.AO	Royal Academy of Dance Examinations Board
42.N	Estyn
43.SBE	The Federation of Small Businesses Wales
44.AO	NCFE Awarding Organisation
45.TA	Association of Teachers and Lecturers (Cymru)
46.TA	NUT Cymru
47.AO	Education Construction Industry Training Board
48.I	Emma Dale, Connah's Quay High school
49.I	Ewen McLaughlin, Gower College
50.I	S Davies, Science teacher
51.I	John Nicholson, Governor, North Wales Secondary School
52.I	Glen Gilchrist, Newport High School
53.FE	Pembrokeshire College
54.SV	National Union of Students Wales
55.FE	Coleg Cambria
56.N	Ofqual
57.HE	UCAS
58.SBE	The JSSC Group (Skills for Justice)
59.SBE	IMEJ Windows
60.I	D Kitcher
61.HE	Higher Education Wales
62.TA	ASCL

1.6 Analysis of responses per question

Q1	Agree barriers / case for change	43 Agree	7 Disagree	12 Not mentioned
Q2	Features of current system to be retained	32 Portability of qualifications 20 Multiple / choice of awarding organisation 10 CQFW 6 Collaboration with other organisations 4 NOS		
Q3	Views on vision for Qualifications Wales	Welcome Not welcome No opinion	No reservations With reservations Independent regulator only	9 41 5 3 4
Q4	Views on activities and functions in relation to regulating and awarding	39 Agree regulating function 24 Agree awarding function in addition 11 Disagree awarding function 12 No opinion expressed		
Q5	Broadly agree with proposed governance arrangements	45 Agree	1 Disagree	16 Not mentioned
Q6	Scope and functions about right (albeit with reservations)	43 Agree	14 n/a	
Q7	Strengthening public confidence in qualifications offered in Wales	Analysis n/a		
Q8	Impacts	Analysis n/a		
Q9	Additional Comments	27 responses		

2. Children and young people's consultation

2.1 Background

The Welsh Government commissioned an external facilitator, *Cognition*, to consult specifically with children and young people in Wales on their opinions regarding the proposal to establish Qualifications Wales, and other qualifications-related issues.

2.2 Methodology

Over December 2013 and January 2014, *Cognition* talked with 124 children and young people in 12 different institutions across Wales, asking them questions on the following issues:

- What do you think of the Qualifications Wales proposals?
- What do you think of the proposals for a Personal Learning Record (PLR)?
- How would you prefer to get information on qualifications?

In order to gather meaningful opinions, it was essential that the children and young people engaged understood the details and background of the proposals in a clear and engaging manner. This was achieved using an animated PowerPoint presentation that demonstrated the following issues:

- How the current 14 – 19 qualifications system works.
- The problems identified in the Review of Qualifications and the case for change it presented.
- How the proposed new system will work.

The participants were divided into smaller groups and given 10 to 15 minutes to discuss the proposals. Groups were asked to note their ideas on sheets under the following headings:

What do you think of the proposals for QW?

- Potential Benefits
- Potential Problems
- Advice for QW

The *Cognition* facilitator circulated during this small group discussion in order to answer any questions and provide support.

The other consultation subjects, such as opinions on the ULN and PLR proposals and preferences for getting information on qualifications were explored through direct, facilitated discussion following the presentation of the necessary information.

In this way, when it came to the formal consultation questions, the young people were able to respond with a considerable amount of thought and debate between themselves. The discussions were all recorded.

2.3 Summary of participants

A total of 124 children and young people participated in this engagement activity. The following table provides a breakdown of this number into places of learning.

Schools (older age groups)	52
Schools (younger age groups)	13
Colleges	35
Training Provider	16
University	8
Total	124

2.4 Summary analysis

Perception of current GCSEs

Participants in every group raised this concern, except in the two pre-GCSE groups who are more likely to sit the new exams and are, therefore, not immediately affected by this issue.

The main concern was that the problems arising from the differing perceptions of the quality of qualifications offered by the various Awarding Bodies will, under these proposals, simply shift to a comparison between the old and new qualifications, between the pre- and post-Qualifications Wales GCSEs and A Levels.

Participants noted that, if the intention is to produce the most highly regarded qualifications possible, seen across Wales, the UK and the world as the 'gold standard', then will this reflect on what existed before. If the current GCSEs and A Levels come to be seen as lower quality qualifications, the implications for the participants are very worrying, regarding further education and employment prospects.

In order to overcome this potential problem, participants suggested three principal approaches: marketing, education and enforcement. They were concerned that the emphasis in marketing the Qualifications Wales system should be on simplicity and fairness rather than the quality of the qualifications offered. There were many suggestions for a campaign of education directed at public perception and the understanding of educational institutions and employers regarding the parity of qualifications awarded pre- and post-the establishment of Qualifications Wales. Participants also suggested that there should be some legal or policy means of ensuring that employers do not discriminate on the basis of those who have the new GCSEs and A Levels and those who do not.

Impact on people with additional learning needs

This theme arose from two main concerns:

- Many participants understood that one of the reasons for schools choosing different Awarding Bodies under the present system is in order to suit the needs of their students. Some boards are seen as offering less academically challenging courses and these may be chosen in order to suit students with lower academic abilities.
- Some of the current boards offer better support for ALN than others, regarding adapted papers, provision of equipment, software, etc. Participants were very concerned that QW should offer the best possible opportunities for people with ALN. This should take the form of differentiation within the qualifications offered, continuing the tier and modular system in place currently, considering the wording of questions and supporting material, the provision of adapted materials and of equipment, software, etc.

Impact on schools and teachers

Many concerns were raised about the additional workload placed on teachers who would need to make the transition to new course syllabuses, especially during the transitional period when they may need to deliver courses for several different qualifications at the same time. Many participants considered that schools and teachers may not be used to making such changes because they have been delivering the same qualifications and courses for many years.

Portability/compatibility with the rest of the UK

Participants were concerned about the prospect that the new Qualifications Wales qualifications might be regarded with suspicion by universities and colleges outside Wales, thus prejudicing Welsh students' chances of continuing their education in the rest of the UK.

There was also discussion about the problems that might arise for younger students moving schools in either direction between Wales and England. It was recognised that whilst this may cause problems currently because schools use different Awarding Bodies and students may move to a school that teaches different courses with different syllabuses, once Qualifications Wales is in place it will certainly be the case.

It was noted, though, that students in Wales would find it easier to move between schools if they were teaching the same qualifications.

Considerations for transition

Participants focussed on how the new system could be introduced with minimal disruption and risk for learners and schools. Their emphasis was on

the need for a slow, measured transition that accounts for the time it will take for teachers and pupils to adjust to the new system and that takes into account the variation between schools in the way they run courses (over 1 or 2 years).

The issue was also raised regarding Stage 1 of the transition process, with Qualifications Wales as the regulator of existing Awarding Bodies. Were Qualifications Wales to deem that a particular course was not satisfactory, they would need to take account of the impact on those students who may be currently undergoing that course or considering opting for it.

Level of the new examinations

Participants were concerned that Qualifications Wales seriously considers how it achieves the right level of difficulty for the new examinations, considering that one of the main problems with the current system is the perception of variable difficulty across the boards.

Suggestions included using a balance of material from across previous examination papers and different boards and setting up a pilot / focus groups to gauge the most appropriate level of difficulty for the majority of students. It was also suggested that once a level had been set, in the interests of fairness and consistency, it should not be changed for some time.

Re-sit issues

Concerns focussed on two possibilities:

- What happens if someone has studied for the current qualifications and then wishes to re-sit once the new Qualifications Wales system is in place?
- If the Qualifications Wales system has a negative impact on the perception of the current qualifications, will people be supported in re-sitting in order to gain the new qualification?

One participant advised that the current courses and qualifications should continue to be offered for re-sit over a reasonable number of years following the introduction of the new system.

Political issues

Participants were concerned about the relationship between Government and Qualifications Wales:

1. That such a major change is not used as a political football should the political makeup of the National Assembly change or in the event that attitudes change over time. They used Foundation Phase as an example of how an educational policy can be affected by political and attitudinal changes and the adverse impact this can have on learners and professionals.

2. That the independence of Qualifications Wales does not reduce its accountability.

Content of new courses

Participants felt that this was an opportunity to consider the content of all courses and the educational emphasis they have. Some suggested that all qualifications should have some element of Life Skills to enable students to best use their learning in the real world, whilst others would like more of an emphasis on fostering understanding rather than learning a formula to pass exams.

Range of subjects offered

There was concern that the new system should not reduce the range of subjects offered at GCSE and A Level. It was noted that if a student wished to study an unusual subject of a minority interest it was frequently possible to find one of the current Awarding Bodies offering it and that it was less likely that Qualifications Wales would be able to offer such a range.

Unemployment

There was concern that the ending of Awarding Bodies' activities in Wales would lead to an increase in unemployment.

2.5 List of participants

Schools	Type	Date	Region	Participants
Rhyl High School, Rhyl	English medium Secondary School	14.01.14	North	7
Ysgol Gyfun Bro Morgannwg, Barry	Welsh medium Secondary School	16.01.14	South East	12
Stanwell School, Penarth	English medium Secondary School	17.01.14	South East	11
Brynmawr Foundation School, Ebbw Vale	English medium Secondary School	23.01.14	South East	8
Ysgol y Strade, Llanelli	Welsh medium Secondary School	03.02.14	South West	14
Schools – Younger age groups				
Glyncollen Primary School, Swansea (Year 6)	English medium Primary School	02.12.13	South West	6
Stanwell School, Penarth (Year 9)	English medium Secondary School	17.01.14	South West	7
Colleges				
Coleg Menai, Llangefni	Further Education	13.01.14	North	9
Coleg Cambria, Wrexham	Further Education	14.01.14	North	12
Pembrokeshire College, Haverfordwest	Further Education	24.01.14	South West	14
Training Provider				
ACT Cardiff		28.01.14	South West	16
University				
The University of South Wales – Pontypridd		07.01.14	South West	8
Total Number of Participants				124