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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation Document

# Consistent measures for post-16 learning in Wales

Date of issue: 30 January 2017  
Action required: Responses by 1 May 2017

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

<b>Overview</b>	This consultation seeks your views on the proposed changes to the performance measures for school sixth forms and further education colleges
<b>How to respond</b>	<p>This consultation will close on 1 May 2017. You may respond by email or post.</p> <p>Please send your consultation response to <a href="mailto:post16quality@wales.gsi.gov.uk">post16quality@wales.gsi.gov.uk</a>, or to the postal address below.</p>
<b>Further information and related documents</b>	<b>Large print, Braille and alternative language versions of this document are available on request.</b>
<b>Contact details</b>	<p>For further information please contact:</p> <p>Bethan Milton Welsh Government Ty'r Afon Bedwas Road Caerphilly CF83 8WT</p> <p>e-mail: <a href="mailto:post16quality@wales.gsi.gov.uk">post16quality@wales.gsi.gov.uk</a> Tel: 0300 025 3905</p>
<b>Data protection</b>	<p>How the views and information you give us will be used</p> <p>Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.</p> <p>The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.</p>

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

## What are the main issues?

The Welsh Government is developing its approach to measuring the outcomes of post-16 learning programmes<sup>1</sup> delivered in school sixth forms and further education (FE) colleges. Performance measures are used in a number of ways; they are important in evaluating the effectiveness of learning; they are part of the evidence base used by Estyn (the Office of her Majesty's Inspectorate for Education and Training in Wales) during inspection or thematic inspection work; they help learning providers to assess their own performance and identify where improvements may be needed; and they help the general public, particularly learners, their parents and carers, to make decisions, alongside other factors, about the best choice of learning provider and course and engage with providers on their performance. Performance data is not an end in itself, but a starting point that can help to identify providers, programmes, departments or groups of learners which are not reaching their potential, and where support is needed to bring about improvement.

This consultation seeks your views on the proposed changes to the performance measures for school sixth forms and FE colleges.

Our work on performance measures for post-16 learning has been developed over a number of years and is on-going. Over the same period, [Successful Futures](#), the Independent Review of Curriculum and Assessment Arrangements in Wales, was undertaken by Professor Graham Donaldson, and a programme of curriculum reform is now underway in response to Professor Donaldson's recommendations.

*Successful Futures* makes clear that future arrangements will give priority to using assessment as a means to inform better teaching and learning. This will entail a move away from the Welsh Government using information about children and young people's performance on a school-by-school basis for accountability purposes and renewed emphasis on assessment for learning as an essential and integral feature of learning and teaching.

In school sixth forms, the focus on learner outcomes has traditionally been less strong than in compulsory education, so we are starting from a point of knowing too little about what really works for learner outcomes, rather than from a position of complex performance management regimes. The proposed introduction of new performance measures offers an opportunity to address this, and in keeping with the spirit of school curriculum reform, we want to ensure that we are measuring the right things and helping schools and colleges to focus on achieving the best possible outcomes for their learners.

Recognising that post-16 learning in Wales is carried out through the mediums of Welsh, English and in some settings bilingually, we need to take into account how post-16 education contributes to the Welsh Government's aim of a million Welsh speakers by 2050<sup>2</sup>. Alongside these outcome measures, we are also developing

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<sup>1</sup> Learning programmes are made up of a coherent 'package' of learning activities (qualifications) with a defined purpose and outcome. Further information is available at:

<http://gov.wales/topics/educationandskills/learningproviders/post-16-planning-and-funding/?lang=en>

<sup>2</sup> The consultation for the Welsh Language Strategy ended in October 2016 and the final strategy will be published in the summer: <https://consultations.gov.wales/consultations/welsh-language-strategy>

performance measures that will allow Welsh Government to quantify the contribution post-16 education makes to enabling learners to continue to develop their Welsh language skills, and to evaluate providers' performance in terms of delivering Welsh-medium or bilingual provision. Meanwhile, we propose to measure learners' outcomes regardless of the medium of learning and assessment, and to publish analysis by medium wherever it is useful and possible to do so.

## **Purpose of this consultation**

This consultation sets out our proposed improvements to the use of data feeding into a school and college accountability system. However, data is only a starting point, and needs to be looked at with other contextual factors in terms of self-evaluation and self-improvement.

By doing this we will also help parents, learners, the Welsh Ministers and inspectors understand the quality of provision through a combination of:

- Summary data that gives a snapshot of a provider's overall performance; and
- Additional data on specific aspects of the provider's performance; this will include particular types of programmes/qualifications and particular groups of learners (such as those who undertook learning through the medium of Welsh, or those from deprived backgrounds).

## **Where are we now?**

Current measures of learner outcomes in the FE and sixth form sectors are entirely separate. This means that, although we have a standard system for planning and funding learning programmes across the two sectors, we cannot measure the outcomes of these programmes in the same way.

- In FE, the current main measure is 'learning activity success' which is based on all terminated learning activities, and therefore combines learner completion and attainment, but without taking any account of grades or qualification points scores.
- In sixth forms, the current 'Level 3 threshold' measure is based only on pupils who are entered for examinations; it therefore does not include retention/completion, but does take some account of grades. The other main measure, based on points scores per grade achieved, is based on the cohort of pupils in learning in January of each year. In 2015, two new measures were added to the All Wales Core School Data Sets (AWCDS)<sup>3</sup> for schools with sixth forms. These are the percentage of learners achieving 3A\*-A and 3A\*-C at A-level (or equivalent), but these are not publicly available.

Measures are published in different formats and at varying levels of detail for schools and for colleges. This lack of consistency means that outcomes for colleges and

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<sup>3</sup> The All Wales Core datasets provide schools and local authorities with analyses of key stages, and external examination results to provide performance comparisons using a range of contextual factors. The reports support the school self evaluation process and Estyn's inspection framework by providing a consistent data set for both schools and inspection teams.

schools cannot be measured on a 'level playing field', even where learners are doing the same learning programmes in different settings. It also means that learners cannot make an informed choice that considers outcome data about the best provider or learning programme to meet their needs.

We believe that neither set of existing measures is entirely comprehensive, and that we need to develop a new approach which provides a more rounded picture of learner outcomes. The [A level results in 2016](#) provide further evidence that we need to sharpen our focus on the grades learners achieve, as well as looking at broader issues around learner retention and progress.

Schools and colleges need the autonomy to decide how best to meet the diverse needs of their learners. However, this must be balanced with a system that holds providers to account for the quality of the courses they provide; the progress their learners make; the qualifications they attain; and the destinations they reach.

The drivers for change include:

- The [Review of Qualifications for 14 to 19-year-olds in Wales](#), which recommended that:
  - the Welsh Baccalaureate achievement be used as the key measure of attainment;
  - the development of a 'level 3 plus' threshold measure should be considered, to encourage aspiration to higher grades; and
  - Estyn should report separately for schools on outcomes in sixth forms once consistent data is available.
- The [Post-16 Planning and Funding Framework](#) aims to better understand the return the Welsh Government gets from its investment in the post-16 sector in Wales and to ensure learners undertake a programme of learning that leads to progression. To achieve this, the framework gathers information at a programme level to inform and influence delivery in future years. This process aims to highlight programmes which are underperforming and to identify priority areas in response to demands for provision. In order to achieve this, data for schools and FE colleges is required on a consistent basis.
- The [Youth Engagement & Progression Framework](#) places clear expectations on providers to identify pupils who drop out mid-programme (or are in danger of doing so) and liaising with external agencies to support/monitor them.
- The [Oxbridge Ambassador's Report](#), which summarised the findings of data analysis and a consultation with students, teachers and other key stakeholders, to identify the barriers which may prevent Welsh learners from progressing to selective universities. The main issues were identified as raising standards, boosting self-esteem and sharing best practice to build up our most able and talented young people, and encourage aspiration to higher grades.
- The 2016 A level results showed a decline in the number of grades awarded in the A\*-A and A\*-C ranges. Ministers have asked officials to develop an **A level improvement plan** and evidence is currently being gathered from schools, colleges, education consortia and other stakeholders to inform the plan's development. It is anticipated that the plan will include a stronger focus on

monitoring and target-setting for A level outcomes, and this means that it is particularly important to have robust, clearly understood measures, including the grades achieved by learners, which can be applied across all A level settings<sup>4</sup>.

**Q1.** Do you agree that there is a need to change the existing performance measures for sixth forms and FE colleges? Please explain your reasons.

**Q2.** Do you agree with the overall principle of having a consistent set of measures, where possible, where learners are undertaking similar learning programmes in different settings? If not, please say why.

## Proposed measures

We are undertaking work to develop a new set of measures which give a more rounded picture of learner outcomes in the post-16 sector, and which can replace the existing measures.

We have worked closely with groups of schools, local authorities, regional consortia, FE colleges and with Estyn to develop the proposed measures, to help ensure that the approach is well understood, fit for purpose and has buy-in from the sector. This has included informal discussion with groups of stakeholders, as well as setting up specific working groups. The information gathered will be used along with the outcomes of this consultation to inform development of the measures.

This work with stakeholders will continue as we develop the detailed methodology, pilot the various measures and produce model reports so that schools and colleges can see how their data will look.

The intended suite of measures are:

**Learner achievement** (which shows whether learners stayed until the end of their courses and achieved their qualification aims)

**Post-16 value added** (which shows the progress learners made based on their previous attainment)

**Destinations** (which shows whether, after leaving learning, learners successfully progressed into further learning or employment)

**Q3.** Do you agree that the above measures are appropriate? Are there any other measures that we should consider?

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<sup>4</sup> Approximately 70% of Welsh Government-funded A levels are delivered in school sixth forms, and 30% in FE colleges.

This consultation goes into specific detail about the proposed achievement measures, as these are at the most advanced stage of development. We have included further detail and specific questions about the achievement measures in a technical annex. We are also seeking feedback on our general approach and the full suite of measures being considered. We recognise that some respondents will want to comment only on the more general questions contained in the main body of the consultation paper, and we welcome responses on this basis. Those who are involved in data handling and analysis may be best placed to respond to the questions in the technical annex.

## Learner achievement

**Definition:** We envisage that this measure will comprise:

- **General education**<sup>5</sup> completion and retention of learners for the full two-year programme, and attainment of grades A\*-A, A\*-C and A\*-E for A level and equivalent qualifications
- **Vocational** completion and attainment of main qualifications at level 1, 2 and 3 and grades at level 3
- **Welsh Baccalaureate** attainment

The proposed new measures will introduce a new, more rounded approach which takes account of learner retention and attainment including, where appropriate, grades.

Last year additional measures, looking at the achievement of three A levels or equivalent at grades A\*-A and A\*-C, were included in schools' All Wales Core Data Sets for schools' self evaluation but have not yet been published in a public forum. We are proposing to build on these measures and we are currently working on the detail of the methodology, including defining the learner cohorts included in each measure.

We are proposing to measure general education programmes (those which are entirely made up of A levels, or which are a combination of A levels and other courses such as level 3 vocational learning activities and the Welsh Baccalaureate) separately from purely vocational programmes. This is because learners starting on an A level programme generally have the aspiration to complete the two year programme (comprising a number of AS and A2 levels), and typically progress on to higher education. The majority of vocational programmes are based on a single main qualification undertaken across one or two years.

Following a recommendation in the [Review of Qualifications](#), the reporting of school performance at Key Stage 4 is now based on the pupils who were in Year 11 rather than for pupils aged 15 at the start of the academic year. The current performance measures for schools at Key Stage 5 are based on those learners aged 17 at the start of the academic year. The measures for FE are for all ages. It is proposed to remove this age restriction to include all learners (regardless of age) undertaking full time general education programmes<sup>6</sup> therefore for example, adult learners undertaking an evening A-level class will be excluded from the measures.

<sup>5</sup> In this paper we use the term 'general education programmes' to mean AS/A level programmes and 'mixed' programmes which combine AS/A levels with other level 3 qualifications such as BTECs.

<sup>6</sup> Part-time learners will be included in more detailed breakdowns of attainment of all qualifications

### Timescale for introduction

- Data for the 2015/16 academic year will be used to model the proposed new measures for **general education** and **vocational** achievement and success. We anticipate that there will be a transition period where we continue to publish the existing measures, until the new approach is fully established.
- The new **Welsh Baccalaureate** programmes were introduced in autumn 2015 and are gradually being adopted, although for the next few years there will still be inconsistencies in take-up across schools and colleges. The first post-16 Foundation (Level 1) and National (Level 2) outcomes will be available for 2015/16, and the first Advanced (Level 3) outcomes for 2016/17. Due to the newness of the programmes and a number of implementation issues, the first year's outcomes for each programme will not be published at individual provider level.

**Q4.** Do you agree with the proposal to remove the current age restriction in place for sixth form learners (those learners aged 17 at the start of the academic year) to include all learners undertaking full-time level 3 general education programmes in sixth forms and colleges?

**Q5.** Do you agree with the principle that we should measure level 3 general education outcomes over a two year period?

Further details and questions on the technical aspects of the achievement measures can be found in **Annex A**.

### Post-16 value added

**Definition:** A measure of the progress learners make between different stages of learning relative to that of other learners.

Value added is an important measure because it recognises that education providers are capable of helping all learners progress, regardless of the grades they achieve. It does this by predicting what outcomes learners are likely to achieve at their next stage of learning (e.g. A level or equivalents) based on their prior attainment (usually GCSEs), and then measures the progress they make by comparing their predicted and actual outcomes.

Prior attainment is used to predict future outcomes because it usually has the most significant association with outcomes, for example learners who did well at GCSE are more likely to do well at A-levels. This means that providers with high intakes of more able learners will always perform better than those with higher intakes of less able learners when using traditional performance measures (the proportion of learners achieving grades A\*-A and A\*-C (or equivalent)). Value added provides a more rounded picture of provider performance by measuring the progress learners make from their actual starting points.

In Wales there is already an established tool for value added at Key Stage 4 in secondary schools, but there is no equivalent for post-16 learning. Some local authorities and colleges purchase different commercial products, but there is no

## Post-16 value added

system which can be applied consistently across Wales. In 2015 we undertook a scoping exercise on options for the calculation and presentation of a post-16 value added measure. Education providers indicated that their priorities were for a model that:

- is simple and easy to understand
- reports on the performance of each subject and qualification that they deliver
- helps identify their strength and weaknesses
- reports at the start of autumn term.

Following a procurement exercise, we appointed FFT Education Ltd to develop, pilot and implement a Welsh post-16 value added model. The pilot will be carried out in Spring 2017 with all school sixth forms and FE colleges. Based on the scoping phase and consultation with providers to date, the pilot model will:

- be based on prior attainment alone, but include analysis on value added for learners with different characteristics;
- use Key Stage 4 as the prior attainment indicator;
- combine source data from Wales and England;
- include learners undertaking level 3 graded qualifications;
- include learners aged 16-18 attempting at least one A level qualification or equivalent (where there is a strong association with prior attainment);
- include those in-scope learners (as above) that can be matched with their Key Stage 4 data (prior attainment);
- report on three indicators of value added:
  - Total points per learner
  - Total volume of entries
  - Average grade per entry; and
- provide a breakdown of results by learner characteristics.

### Timescale for introduction

Data analysis is currently underway and in spring 2017, all colleges and schools with sixth forms will receive post-16 value added pilot reports. We will conduct a series of consultation exercises to gather feedback on the draft measure and reporting formats.

Following the pilot and consultation, we intend that the new measure will be in place for the beginning of the 2017/18 academic year.

**Q6.** What are your views on our proposed approach to the introduction of a national model for measuring value added? If you are a learning provider and already use a value added model, please let us know what features are particularly valuable and should be included in our future approach.

## Destinations

**Definition:** The proportion of learners who progress into further learning (including higher education) or employment.

Careers Wales undertakes an annual survey of school leavers which gives a 'snapshot' of their immediate destinations, and we have done some experimental analysis of educational outcomes for Level 3 learners. There is, however, no systematic approach to looking at the sustained destinations of learners, and no robust way of identifying progression into employment.

The UK Government has established a large-scale data linking programme in England. Known as the Longitudinal Education Outcomes Study (LEOS), it matches learner records to the Department for Work and Pensions' and Her Majesty's Revenue and Customs' data on employment, earnings and benefits, giving a more comprehensive picture of learners' destinations than has ever been possible before.

We have secured agreement for the Welsh Government to participate in LEOS, and are working with UK Government colleagues to agree details of our involvement. In order to have the full picture of learner destinations, including education as well as employment, we are also establishing an annually updated matched dataset which will bring together records for schools, further education, work-based learning and higher education in one place, with employment data from LEOS providing the final piece of the jigsaw.

### Timescale for introduction

We are in discussion with the UK Government to agree timescales for a pilot matching exercise, which is provisionally scheduled to take place in March 2017.

Following a procurement exercise, we have appointed London Economics to carry out an annual data matching exercise, linking school, FE, higher education and examinations data so that learners' progress through the education system can be measured to enable statistical and research analysis of learner pathways. The first iteration of this matched dataset will be in place in March 2017. During summer and autumn 2017 we will be undertaking experimental analysis on the matched data and starting to define a measure for positive destinations.

**Q7.** Do you have any views on what should be defined as 'positive destinations' for post-16 learners?

### Publishing the new measures

Once the new measures are all in place, we propose to develop an online portal similar to [My Local School](#), so that learners, parents and carers, employers and other interested parties can have access to information to inform decision-making. The working title for this portal is 'Post-16 Choices'. We will be consulting on this more widely with stakeholders including providers, learners and parents in due course.

More detailed data will be provided to individual schools and FE colleges than will be publically available. Published data will use standard protocols to ‘suppress’ figures relating to small numbers of learners to remove the risk of identifying an individual learner.

We will also consider how detailed benchmarking data can be made available to consortia, local authorities, schools and colleges, and how it can be presented clearly for a range of audiences. This will include additional data on specific aspects of the provider’s performance; including particular types of programmes/ qualifications and particular groups of learners (such as those who undertook learning through the medium of Welsh, or those from deprived backgrounds).

**Q8.** Do you agree that performance data should be widely available to the general public via an online portal?

The development of new measures would also require changes to our headline reporting through Welsh Government Statistical Releases. Data are currently published annually through [Examination Results in Wales](#) (schools) and [Learner Outcome Measures for Further Education](#), both of which have achieved National Statistics designation, meaning they meet the highest standards for official statistics of trustworthiness, quality and public value. As we develop the new measures, data will be published as experimental statistics, and will continue to be produced and released in accordance with the Code of Practice for Official Statistics. The aspiration would be for National Statistics designation for any new data series over time.

In addition, we are looking at how (anonymised) matched education and destinations data can be made available to the academic community to inform wider research.

### Timetable

The table below provides a summary of the provisional timeline for each of the proposed measures:

Proposed measure	Provisional timetable	Key milestone
<b>Learner Achievement</b>	Summer 2017	Issue experimental data tables to each individual college and school with sixth form based on 2015/16 data to illustrate outcomes based on the proposed measures (these will not be published).
	Spring 2018	Data from the 2016/17 academic year will be issued to each individual college and school with sixth form to illustrate outcomes based on the proposed measures (these will not be published at provider level, but consideration will be given to publication as experimental statistics at an all-

Proposed measure	Provisional timetable	Key milestone
		Wales level).
	Spring 2019	Data from the 2017/18 academic year will be issued to each individual college and school with sixth form and will be published at an all-Wales and provider level.
Post-16 value added	Spring 2017	All colleges and schools with sixth forms will receive post-16 value added pilot reports.
	Spring/summer 2017	Consultation exercises to gather feedback on the draft measure and reporting formats.
	Autumn 2017	Following the pilot and consultation, we intend that the new measure will be in place for the beginning of the 2017/18 academic year.
Destinations	Summer/autumn 2017	Experimental analysis on the matched data and starting to define a measure for positive destinations.

**We anticipate that we will continue to publish the existing measures for schools and colleges in parallel until at least 2017/18.**

We will publish a more detailed transition plan alongside the consultation outcomes in the summer.

**Q9. Do you have any views on the proposed timetable or any issues that may impact on our ability to achieve it?**

## Technical annex: Learner achievement

This annex focuses on the proposed achievement measures. It defines the cohort of learners who will be included at each stage of the analysis, based on the overall principle of a comprehensive approach which takes account of learner retention and grades. It is intended that a consistent approach will apply where the same or similar programmes are being delivered in schools and colleges.

Tables 1, 2 and 3 below show how the three overall achievement measures would be defined. These will all be calculated at learner level and then aggregated at provider level, rather than for individual learning activities (as is the case for the existing FE success measure). In addition, we propose to publish more detailed breakdowns of attainment of all qualifications (for full and part time learners of all ages), to give an indication of outcomes at subject level.

**Table 1 Achievement measure: Level 3 General Education programmes**

Starting cohort	Early drop-out	Completion	Retention	Year 2 attainment	Two-year attainment
All learners enrolled on three or more A level or equivalent qualifications. Our proposed approach allows for the fact that many learners drop one qualification during, or at the end of, their first year of A level study. This will not be treated as a 'failure' as the measures will be calculated at learner level rather than for individual learning activities.	The percentage of learners who are in learning at the eight week point.	The percentage of the "eight week cohort" who completed their learning programme (ie their AS or A2 year), regardless of whether they went on to attain qualifications.	The percentage of the "completing cohort" who returned to undertake their second year of study.	The percentage of the "continuing cohort" who attained three or more A levels or equivalent at grades A*-A, A*-C and A*-E.	The percentage of the "eight week cohort" who attained three or more A levels or equivalent at grades A*-A, A*-C and A*-E.
	"Eight week cohort"	"Completing cohort"	"Continuing cohort"		

NB. Early drop out calculates the percentage of learners who left within the first eight weeks of their programme.

**Table 2 Achievement measure: Welsh Baccalaureate**

Starting cohort	Early drop out	Skills Challenge Certificate attainment	Welsh Baccalaureate attainment
All learners enrolled on the post-16 Welsh Baccalaureate (Foundation, National and Advanced).	The percentage of learners who are in learning at the eight week point.	The percentage of the “eight week cohort” who attained the Skills Challenge Certificate.	The percentage of the “eight week cohort” who attained the full Welsh Baccalaureate.
	“Eight week cohort”		

NB. Early drop out calculates the percentage of learners who left within the first eight weeks of their programme.

**Table 3 Achievement measure: Vocational programmes**

Starting cohort	Early drop-out	Completion	Main qualification attainment	Grade analysis
All learners enrolled on full-time vocational programmes (by level).	The percentage of learners who are in learning at the eight week point.	The percentage of the “eight week cohort” who completed their learning programme, regardless of whether they went on to attain qualifications.	The percentage of the “eight week cohort” who attained their main qualification(s).	Analysis of the grades attained for main qualifications.
	“Eight week cohort”			

NB. Early drop out calculates the percentage of learners who left within the first eight weeks of their programme.

**Q10.** Do you agree that in calculating the outcomes of level 3 general education programmes, we should include A/AS level equivalents (qualifications of a comparable size and points value such as the Welsh Baccalaureate Skills Challenge Certificate and BTECs)? Do you have any comments on specific qualifications or types of qualification that should or should not be treated as equivalents? If so, please state why.

**Q11.** Do you agree that it would be helpful to publish breakdowns of grades achieved for A levels, to show outcomes for individual subjects where there are sufficient numbers of entrants?

**Q12.** Should we include grade outcomes for vocational programmes? Should this be at level 3 only?

**Consultation  
Response Form**

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

**Q1.** Do you agree that there is a need to change the existing performance measures for sixth forms and FE colleges? Please explain your reasons.

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**Q2.** Do you agree with the overall principle of having a consistent set of measures, where possible, where learners are undertaking similar learning programmes in different settings? If not, please say why.

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**Q3.** Do you agree that the measures are appropriate? Are there any other measures that we should consider?

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**Q8.** Do you agree that performance data should be widely available to the general public via an online portal?

**Q9.** Do you have any views on the proposed timetable or any issues that may impact on our ability to achieve it?

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**Q13.** 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:

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