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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation – summary of responses

## Consistent measures for post-16 learning in Wales

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

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## Summary of responses to the consultation on consistent measures for post-16 learning in Wales

### Introduction

1. Current measures of learner outcomes in the further education (FE) and school sixth form sectors in Wales are entirely separate. This means that, although we have one system for planning and funding learning programmes across the two sectors, we cannot measure the outcomes of these programmes in the same way.
2. This lack of consistency means that outcomes for FE institutions and schools cannot be measured on a 'level playing field', even where learners are studying the same learning programmes in different settings. It also means that learners cannot use outcome data to make an informed choice about the best provider or learning programme to meet their needs.

### Background

3. The consultation sought the views of stakeholders on a proposed new set of performance measures for school sixth forms and FE institutions. The consultation was launched on 30 January 2017; it closed on 1 May 2017 after a twelve week formal public consultation period.
4. The [consultation document](#) was published on the Welsh Government website and details were circulated to stakeholders with an interest in performance measures in the post-16 sector.
5. All responses were returned using either the online response form or the downloadable response form.

### Key messages

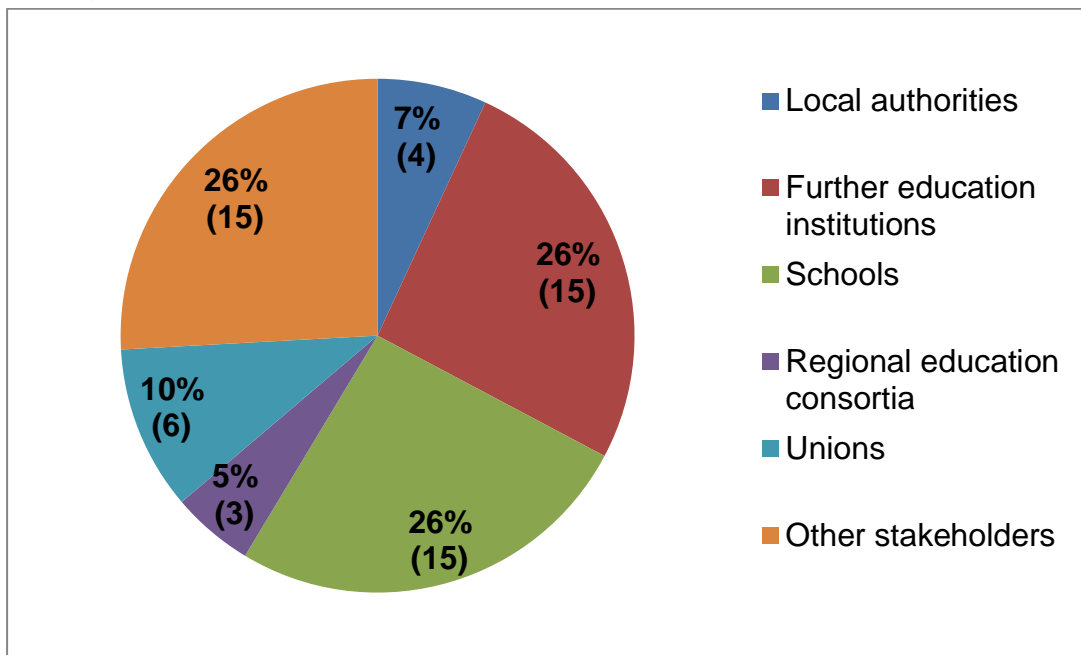
6. The responses to the consultation raised a wide range of issues, questions and suggestions about the proposed measures. This report summarises the comments on each of the consultation questions. Across the whole consultation, the key themes raised by respondents included:
  - All respondents agreed that there was a need to introduce new consistent performance measures, and there was a broad consensus that the proposed measures were appropriate.
  - Respondents were concerned to ensure that the measures placed equal value on academic and vocational achievements, and that they were comprehensive in including learners of different ages, as well as those studying full-time and part-time.
  - Overall, there was support for the concept of measuring learner achievement over two years where appropriate. However, respondents emphasised the importance of individual learner circumstances and wanted to ensure that

the measures could also reflect shorter-term achievements and positive progressions.

- The introduction of a value added measure was seen as crucial to ensure that the learner's starting point is considered.
- Some respondents expressed concern about potential unintended consequences, and wanted reassurance that the new measures would not adversely affect learner choice or incentivise 'gaming' behaviours.
- The availability of more transparent information to inform learner choice was strongly supported. However, some respondents advised caution in comparing learning providers whose size or context might make such comparisons invalid.
- The introduction of the new measures needs to be supported with a sufficient lead in time to ensure they are fully understood by schools and FE institutions.

### Summary of responses

7. There were a total of 58 responses to the consultation from a range of stakeholders. The graph below shows a breakdown of respondents by type of organisation:



8. A full list of respondents is provided in Annex 1.

## Response to consultation questions

Q1.	Do you agree that there is a need to change the existing performance measures for sixth forms and FE colleges?		
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>
	55	0	3
			<b>Total</b>
			58

### Summary analysis

9. All 58 respondents agreed in principle that there is a need to change the existing performance measures. The general consensus was that a more consistent approach was needed to enable young people to compare their options and make informed choices. Respondents also felt that a consistent set of performance measures would help to ensure that learning providers were treated similarly in Estyn inspections.
10. Some FE colleges, schools and local authorities felt that the current measures are too limited in scope as they do not consider the learner's starting point, the transfer of learners between courses or those who leave courses before the examinations. The inconsistency in reporting between schools and FE colleges makes benchmarking performance impossible.
11. However, given the different contexts of types of provision, some respondents were concerned that consistent measures may not be directly comparable. A small number of responses also suggested that work-based learning should be included in the measures, to secure consistency across the whole post-16 system.
12. Overall, respondents felt the measures need sufficient 'lead in' time to be implemented successfully across schools and FE colleges. Careful modelling was required prior to moving to a two-year performance measure for general education programmes at Level 3, to ensure that all of the implications are fully understood and that providers are clear on how their performance is being measured.
13. Some respondents, including teaching unions, identified the need for the measures to be aligned with wider changes in the education sector, including the programme of curriculum reform as a result of *Successful Futures*<sup>1</sup>; the implementation of Professor Ellen Hazelkorn's recommendations on 'building a world-class post-compulsory education system'<sup>2</sup>; the review of professional standards for the post-16 workforce; and greater parity for vocational courses.

<sup>1</sup> [The independent review of curriculum and assessment arrangements in Wales, undertaken by Professor Graham Donaldson](#)

<sup>2</sup> <http://gov.wales/docs/dcells/publications/160310-hazelkorn-report-en.pdf>

*Welsh Government response*

14. The clear need for change is recognised and there is strong support from stakeholders to develop a more consistent, fair approach across the post-16 sector. We appreciate that any system of performance measures has its limitations and weaknesses, and that it is important to build in sufficient time for providers and other stakeholders to understand and use the measures.
15. The measures are being developed to try to take a wider, more comprehensive view of a learner's outcomes, including whether they complete their whole learning programme as well as the outcomes of any exams or other assessments they undertake. By introducing a suite of measures which give a more rounded picture of learner outcomes in the post-16 sector, including a measure of value added, we are able to take the learners' starting point (their prior attainment, and other contextual factors) into consideration.
16. Whilst our aim is to publish clear data on outcomes for all post-16 programmes, it is our initial intention to enable the comparison of the outcomes for the same programmes regardless of the setting in which they are delivered. Work-based learning provision is already measured on the outcomes of learning programmes, with measures designed to reflect European Social Fund requirements, so we do not intend to include them in the achievement measure at this stage. However, our measures for learner destinations will include work-based learning.
17. Whilst Successful Futures makes clear that future arrangements will give a renewed emphasis to assessment as an integral part of learning and teaching, there has been less focus on learner outcomes in school sixth forms than in compulsory education. Therefore, we are starting from a point where we know too little about learner outcomes, rather than from a position of needing to simplify the range of data and measures we use.
18. 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 FE institutions to focus on achieving the best possible outcomes for their learners. We will work across the Welsh Government to ensure that there are clear communications to schools on the overall accountability arrangements, and a 'line of sight' between performance measures at different stages of the curriculum.

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?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	50	0	6	2	58

### *Summary analysis*

19. Most respondents were in agreement with the overall principle to enable learners to make informed choices and see the comparable quality and standards of provision in different settings. They also suggested that a consistent set of measures would offer opportunities for providers to identify best practice and work collaboratively.
20. Some providers, local authorities and unions stressed the importance of consistent measures being applied which may not be directly comparable given different contexts and/or types of provision. For example, it was suggested that for providers or programmes with small numbers of learners, comparisons might not be valid or meaningful. In addition, some concerns were raised about the need to guard against 'gaming' and other unintended consequences.
21. Respondents emphasised that the methods of data collection and reporting must be transparent and auditable across both schools and FE institutions to ensure that the data underpinning the measures is accurate.
22. Whilst respondents recognised that the measures cannot take into account every individual circumstance, they highlighted the importance of acknowledging the regional and local context to identify where the gaps are within the system and support learners to make an informed decision about their post-16 learning.

### *Welsh Government response*

23. The consultation showed that there is a broad consensus in having a consistent set of measures, although some reservations and questions have been raised. It is our aim to measure learner outcomes in the most accurate and equitable way possible.
24. There are concerns that performance measures will drive behaviours, and we recognise that there are risks that we need to manage. For example, the proposed retention-based achievement measure may result in schools and FE institutions being more selective and only enrolling learners they think have a good chance of staying on and achieving good grades, which may have a disproportionate impact on some groups.
25. We are acutely aware that as with the introduction of any performance measures, there will be potential unintended consequences. By having a suite of measures with no one measure having more weight than another, we are attempting to mitigate this risk. We will continue to work closely with the sector and with Estyn to identify and manage the potential risks associated with the new measures,

building on lessons learned from reviewing performance measures at Key Stage 4.

26. We will also work with stakeholders to consider how learner outcomes can be analysed and presented for different groups of learners (including, for example, splits by age group and deprivation categories) to help ensure that data is contextualised.



Q3.	Do you agree that the measures are appropriate? Are there any other measures that we should consider?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	28	2	26	2	58

### *Summary analysis*

27. Nearly all respondents who expressed a view felt that the proposed measures are appropriate. Those in favour thought the measures will be vital in identifying the best performing providers. The measures should provide public confidence as well as improving outcomes for learners.
28. It was noted the measures predominately focus on 'hard outcomes' and do not provide an indication of 'soft outcomes' such as learner well-being and care, support and guidance. Therefore monitoring of outcomes will need to be viewed within the context of local economic and social factors, resource allocation and the differences between sectors and providers.
29. Some teaching unions felt that the proposed measures did not focus enough on the quality of teaching and learning or link to the widening participation agenda.
30. A few respondents felt that Welsh Baccalaureate outcomes should only be included for the cohort which is enrolled for this qualification.
31. Overall it was felt the implementation of the measures must not result in added bureaucracy for learners or for learning providers.
32. Respondents welcomed the Welsh Government working with UK Government in the Longitudinal Education Outcomes Study (LEOS), in order to improve data on learner destinations.
33. Most of the comments on this question were about the detail of the three proposed measures and how they will be calculated. A few respondents did suggest additional measures relating to:
  - learner voice;
  - Welsh medium delivery;
  - widening participation, particularly to learners from deprived backgrounds; and
  - achievement of AS levels (in addition to A level achievement across two years).

### *Welsh Government response*

34. Both schools and FE institutions record data on learners and what qualifications they are undertaking on their own management information systems (MIS). For schools this is uploaded to the Welsh Government via DEWi as part of the post-16 data collection once a year (in October). For FE colleges it is submitted to the Welsh Government via the Lifelong Learning Wales Record (LLWR) on a rolling basis throughout the year.

35. The new measures will not result in new data collections for schools or FE colleges. All measures will be calculated using existing data collections, including the use of data linking for the value added and destinations measures.
36. Achievement of the Welsh BaccaLaureate, and indeed for all learning programmes and qualifications, will only be measured for those learners who are enrolled on them. Schools and colleges have targets for the adoption of the Welsh BaccaLaureate and these will be monitored separately.
37. The Welsh Government will continue to work with schools and FE colleges to improve data quality to ensure the robustness and accuracy of the performance measures. We will also work with colleagues and stakeholders to consider how some of the other factors identified by respondents, such as language of delivery and widening participation, can be factored into the measures. However, there are some 'soft outcomes' which cannot and should not be captured through 'hard' performance measures. It is important to recognise that performance measures can only work as part of a holistic quality assurance and improvement system which reflects all aspects of learners' experiences and outcomes.

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?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	40	4	10	4	58

### *Summary analysis*

38. Most respondents who expressed a view were in agreement to remove the current age restriction from the school performance measures to include all learners undertaking Level 3 programmes.
39. Those in favour agreed that the measures should include all full-time learners regardless of age or setting. This new approach would be consistent with the current system at Key Stage 4. It was suggested that reports could be split by age group, to enable a more meaningful comparison.
40. A few concerns were raised by respondents:
  - Comparisons may not have parity as they may be impacted by learners' prior experiences.
  - There could be a risk of unfair comparisons, as the percentage of older learners is higher in FE institutions than in sixth forms.
  - Consideration could be given to an age limit of 19, to allow for better alignment between providers whilst reflecting the fact that some learners may require an extra year to achieve Level 3.
  - Some unions were concerned that the measures appear to exclude part-time learners.

### *Welsh Government response*

41. For clarification purposes, the proposal is to remove the age restriction from the way performance measures are calculated rather than allowing older learners to attend a sixth form.
42. To reflect the views expressed by respondents, we propose including an age breakdown in the published achievement measures, to show outcomes separately for learners aged 16-17 and those aged 18+. This would ensure comparability between the cohorts being measured in both the school setting and the FE institution .
43. Consideration of the age cohort for the value added measure is affected by our decision to pool Welsh and English data. There are also possible limitations with a value added measure for older learners, as there is a weaker relationship with prior attainment (because of the time lapse since achievement) and/or lack of data on prior attainment. We will work through these issues as part of the ongoing development of the measure.

Q5.	Do you agree with the principle that we should measure Level 3 general education outcomes over a two year period?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	36	14	5	3	58

### *Summary analysis*

44. Thirty one respondents were in agreement with the principle to measure Level 3 general education outcomes over a two year period.
45. Those in favour felt it would provide an accurate picture of progression from one year to another based on a model which is simple and clear to understand by staff, learners and parents. They suggested that measuring over a two year period gives learners the opportunity to mature, develop their softer skills and improve their GCSE grades.
46. However, some respondents felt that it would be useful to include an exemption for students affected by personal circumstances to be measured over a three year period. In terms of value added and destinations these could be measured each year if learners do not return at the end of years one or two.
47. Respondents suggested that other qualifications, such as Access to Higher Education or Level 3 vocational qualifications, should be measured over the expected length of study as determined by the awarding body.
48. Some unions and local authorities felt that the inclusion of two or three year trends would provide more valuable data than rather than just a snapshot of information based on a single cohort.
49. Respondents highlighted the following issues with measuring Level 3 general education outcomes over a two year period :
  - Concern that this will devalue the AS level which Wales has decided to keep. A number of respondents felt that AS and A2 levels should be measured separately.
  - Not all vocational courses are delivered over two years.
  - This approach may prevent learners switching courses or gaining additional Level 2 qualifications before moving onto Level 3.
  - There should be recognition for those learners who leave to start an apprenticeship or go into employment.
  - For reasons of comparability it would be preferable to include the one year completion rate in the measure for two year vocational programmes.

### *Welsh Government response*

50. The Welsh Government acknowledges the differences in individual circumstances, but recognises the fundamental difficulties in incorporating these into measures in a fair and consistent way.

51. The cohort for the general education achievement measure will be any learner enrolled on a three or more A level (or equivalent) programme. Therefore if a learner drops from three AS plus the Welsh Baccalaureate, to two A2 plus the Welsh Baccalaureate in the following year (as frequently happens), the retention rate will not be affected because the learner has returned in year 2. The achievement measure looks at the percentage of this cohort that attains three or more A levels or equivalent. Therefore as long as the learner is still doing three A levels or equivalent, they will be picked up in the measures.
52. A key constraint in relation to publishing AS level outcomes is the differing approaches to 'cashing-in'<sup>3</sup> as it is not mandatory. We have been advised by the WJEC that in 2015/16, 15% of all 17 year old WJEC candidates who could 'cash-in' in did not. Therefore, there would potentially be 5,000 AS level grades missing from any analysis of AS outcomes.
53. We are considering our options in relation to the publication of AS outcomes:
- publish outcomes with a caveat regarding the 'missing' outcomes;
  - only publish outcomes for those learners that do not progress to A2; or
  - do not publish any AS outcomes.
54. We propose to separate the vocational programmes from the general education programmes 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), whereas the majority of vocational programmes are based on a single main qualification undertaken across one or two years. Learners may enrol for one or two years and there is no straightforward way to differentiate.

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<sup>3</sup> Cashing-in refers to the process awarding bodies go through to add together a learner's unit/module scores to calculate an overall AS or A level grade.

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.
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### *Summary analysis*

55. The majority of respondents expressed support for the introduction of a national value added model. However, some providers, local authorities and consortia noted that they currently use commercially available value added models, such as Alps and ALIS, and have invested in them heavily over the years. Attributes that they value the most about these models include timely target setting data, chance graphs, subject specific targets and regression lines. Many wished to continue to use commercial products for internal processes. It was noted that this could cause confusion should results differ between national and commercial models.
56. There was some concern that the model would not include Level 2 qualifications and may unintentionally focus on academic achievements, reducing parity of esteem between vocational and academic routes.
57. More specifically, respondents suggested a new national model should:
- be responsive and timely to providers self-evaluation and planning cycles;
  - take account of prior attainment;
  - provide subject specific estimates;
  - take account of wide variations in deprivation;
  - provide separate reports for academic (AS and A2) and vocational qualifications; and
  - not introduce additional administrative burdens.

### *Welsh Government response*

58. The responses received suggest a number of common themes that should underpin the development of a national model. We know that providers are keen to have timely data that they can use to set learner targets, as well as in their own self-assessment and planning cycles.
59. It is our priority to reduce unnecessary bureaucracy and ensure the new measures are not burdensome to implement. As such, the intended model will utilise data we already hold rather than requiring additional data submissions from providers.
60. We understand that providers require data at the start of the academic year to inform discussions with learners, set targets and plan the curriculum. Our priority is to first establish a model and reporting formats that utilise existing data, and once established and embedded, consider the feasibility of providing forward looking target setting data. It is important to note, however, that the timing will be constrained by the availability of national validated data. Providing estimates for

individual subjects will require a more sophisticated value added model and this needs to be factored into the annual timescales.

61. A draft model has been piloted with all providers in Wales. In the first instance the model will only take into account Level 3 qualifications that have a strong correlation with prior attainment. This means that Level 2 and a number of vocational qualifications will not be included initially. Once the model is in place, we will consider appropriate means of measuring qualifications that have a weaker link with prior attainment. Initial thoughts suggest that other measures, such as destinations, might serve them better.
62. We have recently requested feedback from the sector following the initial pilot and will continue to work with the sector and stakeholders to further refine the model and reporting formats.

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

63. Respondents provided a range of views on the definition of positive destinations:

Positive destination	Number of respondents
Further education (at a higher level)	37
Higher education	37
Employment (part/full-time)	30
Apprenticeships	18
Volunteering	9
Travel/gap year	4
Self-employed	3
Colleges of music and/or performing arts	2
Full-time carers	1
Art foundation courses	1
Continued professional development (specialisms, job satisfaction and career achievements)	1

64. There was a general consensus that any action which represents a step forward in a learner's education, employment or training is a positive destination. Some respondents commented on the usefulness of the annual Careers Wales destinations survey, and asked how this would relate to the new destinations measure.
65. The main issue that concerned respondents was the stage at which the learner's destinations will be measured (eg immediate, within six months, after a year etc.).
66. The majority of respondents felt that it would be useful to publish information on destinations without making a judgement on which outcomes are deemed to be 'positive'. Some felt that this may lead to a lack of parity between academic and vocational study (for example, a student may decide against going to university in favour of undertaking an apprenticeship, which could result in high paid employment in the future). There needs to be some recognition for those learners who desire a change of direction.
67. Some unions felt that the 'positive destination' should be defined as widely as possible, taking into account the varying and differing needs of all learners who are influenced by factors such as the state of the local labour market, broader economic conditions and learners' individual preferences.
68. Where learners are enrolled with more than one provider, respondents sought clarity on how destination data would be captured and which provider would get the recognition for any positive destination.



69. In terms of matching learners' records with Department for Work and Pensions (DWP) data and Her Majesty's Revenue and Customs (HMRC) the Welsh Government will need to consider the implications for the individual's privacy and data protection.
70. It was felt further consideration needs to be given to those learners that leave due to pregnancy, deportation, death, hospitalisation, relocation or becoming a carer.

*Welsh Government response*

71. The Welsh Government has noted the comments in relation to not labelling destinations as 'positive' or 'negative' as each learner is facing different circumstances that affect their decisions. We will consider ways of presenting destinations data, but note that it will not be possible for the measure to account for every individual circumstance.
72. Welsh Government will use data matching to identify where the same learner appears in multiple datasets to identify where they have moved on to. This means we are not reliant on individual schools and FE colleges 'tracking' where their learners go.
73. We will be considering the detailed comments from respondents in developing pilot measures based on the new matched data from autumn 2017 onwards and will share further proposals in due course.

Q8.	Do you agree that performance data should be widely available to the general public via an online portal?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	43	6	6	3	58

### *Summary analysis*

74. Thirty two respondents were in favour of performance data being made available to the general public via an online portal. Those in favour agreed providing that the data is robust and gives an accurate reflection of the standards within an establishment. The information should be published on individual courses as well as at provider level.
75. The information should be well presented, simple, concise and clear with explanations suitable for the target audiences.
76. A few respondents were in favour of an extension to My Local School to include FE institutions, in preference to the development of a separate website.
77. Respondents raised a number of issues in relation to the availability of performance data to the general public via an online portal:
- concerns over the risks of comparing learning providers which may be serving learner cohorts of differing backgrounds and abilities;
  - limitations to the data should be outlined to help the audience to interpret it correctly;
  - three years of data will provide a larger sample reflecting accurately the quality of provision in each provider;
  - levels of attainment should not be published as it takes no account of prior attainment or factors relating to the quality of teaching or learning;
  - caution is needed to ensure that small numbers of learners cannot be identified;
  - numbers of learners previously eligible for free school meals could be very low and publishing data with no real validity could be misleading;
  - the development of an online portal should not divert money from front line teaching;
  - entry requirements differ across Wales, so it would be difficult to compare like with like; and
  - teaching unions reiterated that analysing and reporting data should not add to the workload of staff.
78. It was suggested that undertaking an analysis of those who access the current FE Learner Outcome Reports (LORs) and My Local School could help inform thinking on how the information could be published.

*Welsh Government response*

79. The Welsh Government acknowledges that the majority of respondents agree with our aspiration to make data available via an online portal.
80. This will enable learners, parents and carers, employers and other interested parties to have access to concise, clear, understandable information to inform decision-making. We intend that the portal 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.
81. More detailed data underpinning the published measures will be available to individual schools and FE colleges to help them assess their own performance and identify where improvements may be needed. It is crucial that this information is provided in a user-friendly format and does not add to the administrative burden for practitioners.
82. It is not the Welsh Government's intention to introduce a system of league tables or to encourage unhelpful comparisons between learning providers. Instead, the use of performance measures is intended to help to identify providers that need the most support and guidance, those doing well but that could be doing better, and those that are highly effective and can help others improve. In turn, this will help us to support self-improvement and raise standards across the whole system.

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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*Summary analysis*

83. Most respondents had no issues with the proposed timetable or the ability to achieve it.
84. A number of respondents expressed concerns or suggestions:
- The timetable is overly ambitious and may need a longer implementation period, to help ensure that new arrangements are fully tested.
  - Consideration should be given to a transition year for all measures. Once the measures are finalised there could be one year where providers know their data and relative position but the data is not public.
  - The pilot phase needs to be fully maximised by all stakeholders and early sharing of reports will ensure that practitioners fully understand the measures.
  - There are many changes occurring in the education sector in a short space of time with a back-drop of diminishing post-16 funding.
  - There needs to be an increase in communication with the sector, including through regional information and awareness raising events.
  - There should be a clear communications campaign to explain the changes to learning providers, parents and learners.
  - Some teaching unions felt that the process should be kept under regular review.

*Welsh Government response*

85. It is our intention to continue issuing the existing measures for schools and FE institutions in parallel with the new measures until at least February 2019, covering the 2017/18 academic year to ensure stability and give both schools and FE colleges the chance to understand the new measures.
86. Overall, we anticipate that it will be early 2019 before all of the measures are fully developed and at a stage where they can be published at individual provider level. An indicative timetable is set out in paragraph 113 of this report.

Q10.	Do you agree that in calculating the outcomes of 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?				
	<b>Yes</b>	<b>No</b>	<b>Undecided</b>	<b>No response</b>	<b>Total</b>
	29	14	8	7	58

### *Summary analysis*

87. While half of respondents were in favour of including equivalents, this question showed wide-ranging views and some argued strongly against including equivalents.
88. Those in favour agreed that including equivalents is necessary to provide the most accurate picture. The majority thought that the Welsh Baccalaureate Skills Challenge Certificate should be included as an equivalent, with caveats until it is fully embedded across school sixth forms and FE institutions.
89. Respondents raised a number of issues in relation to using equivalent qualifications (of a comparable size and points value) when calculating the outcomes of general education programmes:
- It was felt too much detail could cause confusion for stakeholders and would be unhelpful, reduce clarity and comparability.
  - A small number of respondents were of the view that BTECs were less rigorous than A levels, and that including these as equivalents would incentivise providers to offer them as an 'easier' alternative.
  - There should be recognition of what a learner has completed in the first year of the Skills Challenge Certificate at Advanced level. A learner does not get the credit for the work done if they choose not to continue for a second year of Level 3 study.
  - The structure and assessment methods of BTECs and A levels are very different and therefore caution should be exercised when attempting to draw comparisons.
  - It is important that sufficient weight is given to non A level subjects, as vocational routes should not be viewed as being of less significance.
  - There needs to be confidence that the Welsh Baccalaureate qualification is of a comparable quality with A levels.
  - It would be helpful to be able to split the measures for AS; A level; BTEC Level 3; Welsh Baccalaureate Advanced level.
90. A number of respondents suggesting using the UCAS tariffs to identify equivalents.

*Welsh Government response*

91. The Welsh Government is considering using equivalent in the general education programme measure to allow the outcomes for learners undertaking 2 A levels alongside a Level 3 vocational equivalent (eg BTEC Diploma), to be regarded on an equitable basis with a learner undertaking a 3 A level programme. The range of responses to this question illustrates the complexity of the issues that need to be considered, and there is no straightforward answer. We need to ensure that our approach reflects parity of esteem for academic and vocational learning, and that it does not incentivise providers to enrol learners on courses that are not appropriate for their needs and abilities.
92. We are mindful of the emphasis in the Review of Qualifications<sup>4</sup> that the qualifications system for Wales should recognise appropriate vocational qualifications on a par with equivalent general qualifications.
93. The final decision on what should count as an equivalent is still to be made, but it would have to be a qualification that is of the same level, size and volume to an A level. We have already made the decision to include the Advanced Skills Challenge Certificate as an equivalent, in line with the Welsh Government's universal adoption policy and the recognition given to the Welsh Baccalaureate by many universities. Given the overall responses to the consultation, we are minded to include BTECs as well, but we will give this further consideration to ensure that any unintended consequences are taken into account.

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<sup>4</sup> <http://gov.wales/topics/educationandskills/qualificationsinwales/revofqualen/?lang=en>

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?				
	<b>Yes</b>	<b>No</b>	<b>Comment only</b>	<b>No response</b>	<b>Total</b>
	38	8	6	6	58

### *Summary analysis*

94. Half of respondents expressed agreement with the proposal to publish grades achieved for A levels to show individual subjects (where there are sufficient numbers of entrants).
95. Those in favour felt learners need to be able to choose courses based on outcomes achieved by previous learners, which will also be useful information for parents. It was also suggested that publishing this information could help to highlight best practice, as well as inefficiencies. Respondents suggested that the proportion of learners who complete courses should be included, ensuring those who withdraw before assessment are noted in the figures.
96. Respondents raised a number of issues in relation to including a breakdown of grades for A levels:
- The information would be helpful at a provider level, but may cause issues if made available to the general public, as it does not take account of prior attainment or factors relating to quality of teaching or learning.
  - Some A level providers do not have sufficient numbers in statistical terms for the data to be robust at course level.
  - Most were in favour of the suggested grouping of grades such as percentage of A\*-A achievements as this supported the focus on more able and talented learners as part of the Seren project.
  - FE institutions could be disadvantaged because they are generally dealing with more diverse cohorts than schools.
  - This is already done by Joint Council for Qualifications (JCQ) at a national level and data is already available at provider level.

### *Welsh Government response*

97. We recognise that attainment data in isolation does not give a fully rounded picture of a provider's or programme's performance. It is our intention that by having a suite of measures, no one measure should be considered in isolation. The value added measure puts into context the prior attainment of the cohort of learners and so recognises the learner's starting point.
98. Published statistics use standard protocols to 'suppress' figures relating to small numbers of learners (typically where a course or group of learners is five or below) therefore we acknowledge that for some subjects, the learner numbers at course level will be too small to publish. We will not publish data that could identify an individual learner.

99. The summer examination results published by the JCQ include only the GCSE and A, AS levels taken in the summer months each year. They do not include examinations taken at any other time of the year. The summer results also include all entries and are not simply restricted to pupils in state maintained schools in Wales but include all candidates who have taken GCSE, A and AS levels. They are therefore not directly comparable with the data we will be publishing for Welsh Government-funded provision.
100. Vocational qualifications are not included in the summer results either. These are provided to the Welsh Government separately in September from the individual awarding organisations. We therefore believe that there is a need to bring together comprehensive data on publicly funded learning programmes into one place in a clear, easily interpreted format.



Q12.	Should we include grade outcomes for vocational programmes? Should this be at Level 3 only?			
	<b>Yes</b>	<b>No</b>	<b>No response</b>	<b>Total</b>
	46	5	7	58

### *Summary analysis*

101. The majority of respondents were in agreement to include grade outcomes for vocational programmes.
102. Of those that were in agreement, just over half felt grades should be included for all vocational qualifications where they are available, including those below Level 3.
103. Respondents felt that the measures must place equal value on academic and vocational outcomes, and not including grades for vocational qualifications would go against this.
104. Respondents raised a number of issues in relation to including grade outcomes for vocational programmes:
  - A small number of respondents felt that grade outcomes for vocational programmes are not defined as rigorously as A levels
  - In order for learners, parents and employers to make informed learning choices, data relating to vocational programme needs to be visible and recognisable alongside general education programmes.
  - Due to the more complex market in vocational qualifications, it is not clear that this reporting could easily be broken down by subject. Other options may be possible, for example publishing a breakdown by subject sector area.

### *Welsh Government response*

105. It is our intention to provide the grade outcomes for those vocational qualifications which are graded (at any level) alongside the overall percentage pass rate. For vocational qualifications which are not graded (i.e. are pass/fail) we shall only include the overall percentage pass rate.

Q13. Any other related issues which we have not specifically addressed?
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106. Some respondents provided some additional comments on the consultation:
- The impact of the Qualifications Wales subject reviews<sup>5</sup> needs to be taken into account, as these are likely to result in changes to qualifications in future.
  - The need to ensure that data management staff receive training to adapt to new reporting formats, to enable data to be submitted accurately and on time.
  - There is a need to separately identify outcomes for students following Welsh medium and/or bilingual courses.
  - Consideration should be given to include work-based learning within the scope of this model to give a single, consistent and comparable view of learner outcomes in a variety of settings.

#### *Welsh Government response*

107. These issues are noted and will be taken into account when finalising the proposals.
108. Recognising that post-16 learning in Wales is carried out through the mediums of Welsh, English and in some settings bilingually, alongside these outcome measures, we are also developing 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.
109. Meanwhile, we propose to measure learners' outcomes regardless of the medium of learning and assessment, and to publish analysis by medium of learning wherever it is useful and possible to do so.

#### **Next Steps**

110. The Welsh Government would like to thank all those who responded to the consultation. We are considering all responses and will finalise proposals in light of the comments made.
111. We are pleased to note the positive overall response and the appetite for change amongst our stakeholders. Respondents have identified a number of detailed issues and helpful suggestions around the implementation and presentation of the measures, and we will continue to work with the sector to consider how these can be addressed. In the short term, we will ensure that our methodology reflects the feedback.

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<sup>5</sup> The programme of sector reviews Qualifications Wales is undertaking of vocational qualifications and the qualification systems which support them. For further details, see the Qualifications Wales [Vocational Qualifications Strategy](#) (2017).

112. Any system of performance measures is, inevitably, a simplification of a complex set of learner circumstances and pathways; our aim is to develop an approach which is as fair, consistent and appropriate as possible, but we recognise that there will always be a need to interpret and contextualise data as part of an overall self-improving system.
113. We will be contacting individual schools and FE institutions with further information, including baseline data. An outline of our proposed timetable for implementation and transition plan is included below:

<b>Proposed measure</b>	<b>Provisional timetable</b>	<b>Key milestone</b>
<b>Post-16 value added</b>	April 2017	All FE institutions and schools with sixth forms received post-16 value added pilot reports.
<b>Learner Achievement</b>	June 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).
<b>Post-16 value added</b>	July 2017	Consultation exercises to gather feedback on the draft measure and reporting formats.
<b>Destinations</b>	October 2017	Experimental analysis on the matched data and starting to define a measure for positive destinations.
<b>Post-16 value added</b>	October 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.
<b>Learner Achievement</b>	February 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-Wales level).
<b>Learner Achievement</b>	February 2019	Data from the 2017/18 academic year will be issued to each individual college and school with sixth form and will be <u>published</u> at an all-Wales and provider level.

114. It is our intention to continue publishing the existing measures for schools and FE colleges in parallel until at least 2019 (covering the 2017/18 academic year outcomes).

## **Annex 1 – List of Respondents**

Adult Learning Wales  
Alun School  
Association of School and College Leaders Cymru  
Association of Teachers and Lecturers Cymru  
Bridgend College  
Cardiff and Vale College  
Cardiff High School  
Ceredigion County Council  
Coleg Cambria  
Coleg Gwent  
Coleg Sir Gâr  
Coleg y Cymoedd  
ColegauCymru  
Education Achievement Service (EAS)  
Education Through Regional Working (ERW)  
Education Workforce Council  
Estyn  
Fitzalan High School  
Flintshire County Council  
Gartholwg Cymru  
Gower College Swansea  
GwE  
Gŵrp Llandrillo Menai  
Gwynedd and Anglesey 16+ Education Consortium  
Higher Education Funding Council for Wales (HEFCW)  
Monmouth Comprehensive School  
National Association of Schoolmasters Union of Women Teachers (NASUWT)  
National Deaf Children's Society Cymru  
National Training Federation for Wales  
National Union of Students Wales  
NEET Strategic Group Merthyr Tydfil  
NPTC Group of Colleges  
Pembroke School  
Pembrokeshire College  
Powys County Council  
Powys Schools Service  
Qualifications Wales  
Radyr Comprehensive School  
Social Care Wales  
St Joseph's RC High School  
St David's Catholic Sixth Form College

The College Merthyr Tydfil  
Undeb Cenedlaethol Athrawon Cymru (UCAC)  
University and College Union (UCU)  
Welshpool High School  
Ysgol Gyfun Gymraeg Bryn Tawe  
Ysgol Maes y Gwendraeth