

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

Consultation response form

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Responses should be returned by **1 September 2012** to:

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Qualifications and Learning Division
Welsh Government
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Bedwas Road,
Bedwas,
Caerphilly,
CF83 8WT

or completed electronically and sent to:

reviewofquals@wales.gsi.gov.uk

Are you a: (please delete as applicable)	Trade Union
Would you be prepared to take part in any follow up activity for the review (e.g focus groups)?	Yes

This response form is in two parts:

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

Please feel free to answer any questions from either part.

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

Learners/parents/carers	Part A and B3, B4.1, B4.2, B5.1, B5.2, B5.3, B5.4, B5.5, B5.7, B5.9, B5.10, B5.11, B5.13, B6.4
Learning providers	All questions
Employers	Part A and B3, B3.1, B3.2, B4.1, B4.2, B5.1, B5.4, B5.7, B6.4
Higher education practitioners	Part A and B3, B3.1, B3.2, B4.1, B5.4, B5.5, B6.4
Awarding organisations	All questions

Part A: For all respondents

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

Question A2.1

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) What, if anything, would you add or change?

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Question A2.2

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

<p>The present system has a range of branding associated with qualifications which can be confusing to users. This could be improved by rebranding within a single qualification framework. Revising the routes to qualifications with a simplification of the pathways to qualifications would also help. The qualifications need clearer signposting for users on how qualifications fit within the structure, and what qualifications they need for progression.</p>

Question A2.3

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Please give reasons.

<p>We agree with the retention of the existing brands in the short to medium term given the current understanding of these qualifications. However, we would urge the Welsh Government to be more forward-looking to take account of the fact that the vast majority of pupils stay in education or training until they are 18. This reinforces ATL's contention that there is no need for national exams before that stage.</p>
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Question A2.4

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

Very much	<input checked="" type="checkbox"/>	To some extent	<input type="checkbox"/>	Not very much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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ii) To what extent does the current suite of qualifications at 14–19 provide clear information about an individual’s literacy and numeracy?

Very much	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not very much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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iii) Please give reasons and any other comments.

We agree in principle that the existing qualifications provide information about an individual’s literacy and numeracy. However, there needs to be greater clarity and agreement on how literacy is defined. A determination of what literacy means and guidance on what goals should reflect would be supportive. Before this agreement is reached the question as to how well qualifications convey accurately the literacy of learners will always be contestable. We are pleased the Welsh Government has recently published a National Literacy Programme and the soon to be published National Numeracy Programme which sets out the actions the Welsh Government intends to implement, to improve literacy and numeracy standards in Wales. The publication of these documents provides clarity of the expectations of literacy and numeracy in Wales and bodes well for providing a structure that distinguishes achievement in literacy and numeracy. We urge the Welsh government to be cautious in the use of qualification data to provide league tables/banding and in the dissection of such data.

Question A2.5

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) Please give reasons and any views on the types of external elements that should be involved in different circumstances:

Controlled assessments have been shown to offer subject dependent variations. Such assessments can consume a significant portion of a teacher’s time, it needs to be considered if this time spent is proportionate in adding value to the qualification process or would a teacher’s time be better used teaching. The external element should exist to provide a robust quality assurance in particular if the internal assessment is weak or there is lack of confidence in the rigour of the assessment.

iii) Should the volume of assessment at 14–19 be reduced?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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iv) If yes, how could this be achieved?

If modular schemes are retained then there would be no increase in assessment, which would be beneficial.

The range of assessment across qualification varies to such an extent; we feel it is difficult to offer a quantifiable answer. We would welcome a review on the amount of assessment carried out; our members have commented that assessment in some subjects is unmanageable. We ask the Welsh Government to consider if the volume of the assessment is necessary and if it is a realistic workload for teachers.

Question A2.6

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

One that helps engage and motivate learners may be found in a system that offers learners a flexible approach to gaining what are regarded as employer-recognised qualifications, by way of a method of learning appropriate to each qualification.

We believe that the qualifications system should be designed to differentiate students, in order for them to be appropriately supported and challenged. The system needs to attract students to continue in education and therefore it must be relevant and provide interest to the learner with clear outcomes to motivate.

Question A2.7

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

It is expected the key issues will relate to properly resourcing welsh medium and the associated costs in doing so. The Welsh Government should become increasingly more aware of diversity in the education system, a potential barrier to delivering welsh medium provision of qualifications at 14-19 may require development of teachers to provide for welsh medium in multi-cultural and multi-lingual society.

Question A2.8

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

It is essential that key stakeholders work together to agree what ‘fit for purpose’ means. Employers need to be clear what they are looking for. Providers need to be candid as to whether or not all or some of those requirements can be delivered by qualifications alone.

The Welsh Government needs to consider the requirements of employers globally and how students in Wales will be put at a competitive advantage with their counterparts across the border. Stakeholders will want to minimise barriers to take up and progression. A structured consultation forum for stakeholders is required to ensure that qualifications are fit for purpose.

ii) How could evidence about the destinations, outcomes and progression of learners in relation to qualifications be improved?

In Wales we have a sophisticated electronic system to track students to provide a view of each student, with intelligence of the progress and predicted progress of the individual. There are however gaps and anomalies where this data is not being applied to the individual and this requirement must be mandatory by all establishments to ensure the data provides the prescribed value.

There is increasing evidence that qualifications provide the minimum requirement for a person to progress. It is the additional information provided that can be the ultimate decider in relation to the outcome e.g. work experience previously undertaken. The direct link between attainment of a qualification and the destination of the learner is therefore not so easy to discern. Recent discussion about internships and the like also show that qualifications alone will not predict outcomes and progression.

Question A2.9

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

Very much	<input type="checkbox"/>	To some extent	<input type="checkbox"/>	Not very much	<input checked="" type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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ii) Please give reasons and any views on how this might be achieved:

There would be some gain for those who are more able and talented to take qualifications when ready as this would keep them engaged and motivated. It would seem that there would be little gain in targeting cohorts of pupils to undertake examinations in this way. Some argue that this approach would present greater anxiety for pupils to achieve at an earlier stage, and would potentially place a burden on establishments to provide a diet of examinations with the expectation that a predicted percentage of the cohort would undertake qualifications prior to the expected age.

We would welcome further clarification on how statistics would be collated if qualifications were taken when ready rather than relating to expected age. We acknowledge that the taking of exams when ready does occur to a small extent, we would question the management for the teacher’s workload if this was made an expectation.

Finally, we would like to reiterate the fact that the recently introduced banding system will make schools reluctant to adopt this approach.

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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iv) Please give reasons.

As some students choose not to continue with their education after the age of 16, the compulsory GCSE in Wales provides the individual with the opportunity to leave full-time education with qualifications. This may provide them with the basics to return to education at a later date. However, as we have noted before, the fact that the vast majority of students in Wales now continue in education and training, coupled with the raising of the leaving age in England, means that the longer term future of GCSEs is worthy for debate.

Question A2.10

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

A qualification system needs to provide a benchmark or recognised standard attained for employers and FE/HE education providers in their selection processes.

We would welcome the Welsh Government to be more forward-looking to take account of all pupils staying in education until they are 18. ATL has consistently argued that there is no need for national exams before then.

People in Wales need to have qualifications which have currency and portability. They should also be appropriate for 'employability'.

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

Very much	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not very much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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iii) Please give reasons for your answer and state whether your views apply to all qualifications or some particular types.

To whatever extent is required in order to properly address the needs of pupils in Wales.

We now have grave concern for education sector in England, due wholly to the education policies being pursued there. The floating of the idea that there could be a return to "O" levels was particularly disturbing as this was a qualification that did not consider the requirements of pupils who were unable to meet the standard.

Wales needs a system that is fit for purpose based on a continuing dialogue with stakeholders, with the conviction of the Welsh Government driven by a strong communication process to show that Wales is confident in delivering excellent qualifications to greater extent than its neighbouring countries.

Question A3.1

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

We acknowledge that the Welsh Baccalaureate Qualification is a recognised brand, however may not provide the perception of value. We feel the current Welsh Baccalaureate Qualification is disparate, with a lack of academic attraction relating specifically to the pre 16 qualification. We must ensure that there is guaranteed consistent quality across centres otherwise any recognition of it as a valued qualification will become diluted. We would like to see existing good practice measured and the views of stakeholders considered prior to any revision. Following revision we would welcome a communication campaign to inform learners and employers of the value of the qualification.

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

We believe this to be sensible. To develop the qualification it needs to affirm its structure identity and what the qualification aims to deliver. It needs to be an attractive qualification that has a definitive model for stakeholders to understand what is being studied.

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

As above

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

Very much	<input type="checkbox"/>	To some extent	x	Not very much	<input type="checkbox"/>	Not at all		No opinion	<input type="checkbox"/>
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We are happy to welcome the role out of the qualification so that every child in Wales has the opportunity to take it. We are not at all clear that ANY qualification could be made mandatory for every child.

Question A3.2

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

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

or

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

or

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

ii) Please give reasons.

Option B seems the most sensible at the present time, but option A may become more attractive over time.

Question A3.3

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) Please give reasons for your answer.

Whilst we acknowledge that A levels are a well recognised qualification for young people providing a defined path for access to university, it is too general a question to respond fully. We think that the appropriateness as fit for purpose varies from subject to subject. We would also like to highlight the scoring mechanism of universities in relation to GCSE and A level's. The proposed change to the tariff system should also be considered here.

Question A3.4

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

The challenge is to balance the work better suited to non-academic learners, within the programme, whilst retaining the validity of the qualification. Vocational qualifications would benefit from broadening at post 16 to support the attraction of the qualification for entry to employment or continuation of education.

Question A3.5

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

Very much	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not very much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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ii) Please give reasons.

We agree this can provide value to the learner and is relevant for employers to consider, however there is uncertainty that employers fully understand the content of the qualification. ESW qualifications would benefit from review in-order to secure its future and provide the benefits that it could achieve for learners.

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

Very much	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not very much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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iv) Please give reasons.

Employers report that there is a lack of key skills amongst potential employees; organisations do value skills although they are not always seen as evidently transferable to the workplace. We are cautious that the claim that these qualifications can be gained within a very short time frame and be equivalent to GCSE is unconvincing. For reasons as stated above (in ii) we would welcome a review of WKS.

Question A3.6

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) If so, how might the qualifications system contribute to this?

While we believe that the STEM subjects need to be more positively promoted in the 14 -19 phase we are wary of the introduction of crude mechanisms to promote them. For instance, we would resist any development of the banding system to take account of the uptake of STEM subjects. There is a perception that the STEM subjects require greater rigor than other subjects and so perhaps it is the latter that require attention, so that students do not look for the 'easy option'. The linking of the STEM subjects with the needs of the economy and the availability of employment also needs careful investigation. Many employers, for instance, are looking for level 3 or even level 4 skills in these areas – not level 2 skills. We must also emphasise the need to promote MFL if Wales is to become internationally competitive.

The banding system might also work against the promotion of STEM subjects as schools may be wary of enrolling students who will lower overall scores. Funding must also reflect the additional costs of delivering the STEM subjects, both pre-16 and post-16 to ensure progression. The National Curriculum must support learners so that they can access STEM subjects and qualifications need to reflect this.

While we would welcome an increase in the number of students studying the STEM subjects this must be on the basis of an informed choice.

Question A3.7

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Do you have suggestions about the messages of the campaign and how to make it effective?

The message needs to provide clarity for stakeholders to understand the different levels of qualifications in context to existing and proposed frameworks. We feel the communication should be delivered so that it is receptive a global audience.

iii) How could learners be better supported, informed and advised when choosing qualifications at 14 and 16?

We would encourage resources to be made available for training of teachers with responsibility for careers education in schools, the careers Wales service will also play a role in supporting pupils.

Additional comments

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

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

Part B: Technical and specialist issues

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

Question B2.2

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) Within a coherent programme of learning should there be scope for some elements that are not linked to qualifications or formally assessed units?

We welcome this approach in principle as a mechanism for the allocation of funding. We feel this would provide flexibility for the learner to enhance their portfolio of qualifications. This approach will also provide opportunities in recognising the diversity of students. We would welcome further clarification on how a coherent programme is defined. Some elements within this scope are presently in existence in the welsh baccalaureate.

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

We note that the benefits have been to allow students the flexibility to utilise their strengths in order to maximise their potential qualification count. Credit-based qualifications offer mobility to the student to continue accreditation through more than one provider. We have been told that some centres find credit based qualifications difficult to understand and so this may be a detriment to learners accessing the benefits of this.

iv) What are your views on the future role of credit-based qualifications in the 14–19 curriculum?

We support the future role of credit-based qualifications. There is particular value for work-based learners and learners with special education needs. Further development of credit-based qualifications would allow it to reach its potential for learners. This will require additional resources to review the design and assessment of the qualification and the subsequent investment by centres to deliver the qualification.

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

We recognise the potential benefits for sharing of expertise found in the collaboration agenda. We are guarded that there will be a requirement for teachers to move between institutions as the means of collaboration. The argument that it will reduce travelling for students is accepted, but may be counter-intuitive if there is a significant increase in staffing costs to accommodate this. Collaboration is successful when it takes place across institutions that are able to offer a qualification with viable numbers and in doing so share expertise to facilitate that. The emerging regional consortia of local authorities may provide guidance and share good practice on collaboration.

Question B3

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) If so, which qualifications should no longer be available at 14–16 and/or 16–19?

With finite resources, a dialogue with stakeholders should take place to ensure Wales is providing relevant qualification for the jobs market. Qualifications that are of little overall value to the learner and that do not act as a credit toward a greater qualification should be removed or redefined to meet minimum criteria. Qualifications that do not lead along an appropriate pathway should not be funded from the public purse.

Question B3.1

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

We believe Welsh Government should aim to establish qualifications that are recognised globally and are comparable to other qualifications across the UK, fit for purpose in the jobs-market and are attractive in meeting the needs of the learner.

Question B3.2

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

To a great extent	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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ii) To what extent should employers play a role in the development of qualifications for 16 to 19-year-olds?

To a great extent	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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iii) Should Sector Skills Councils be the main mechanism for this?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) Please give reasons.

The SSCs have a contribution to make, but should not be the main mechanism as they do not have specific expertise in qualification design and delivery. SSCs also differ in the extent to which they have an understanding of the needs of Wales and do not in general have a close understanding of the needs of SMEs. Consideration should be given to developing close links with the qualifications development process for the reference groups set up by Welsh Government in each of nine sector priorities for economic development.

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

To a great extent	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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vi) Please give reasons.

We believe that Universities have an important role to play and should help ensure that A levels are geared to prepare students to enter HE. However, this should not be done in isolation from the role that other stakeholders have e.g. Welsh Government and employers.

Question B4.1

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

We feel that the best outcome would be to assess literacy and numeracy skills in recognising the learning outcomes (from across the curriculum) and need to link with the KS4 national literacy and numeracy strategies. Assessment design needs to be fit for purpose and be driven by the pedagogy.

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

- a) Commissioning new specifications for GCSE English Language, GCSE Welsh First Language and GCSE Mathematics qualifications for Wales which build directly on the literacy element of the NLNF framework and encourage the development of those skills throughout Key Stage 4 and beyond if needed.
- b) Developing or commissioning new, externally assessed, national literacy and numeracy tests for Key Stage 4 and incorporating these into the core of the Welsh Baccalaureate Qualification at Intermediate level instead of Essential Skills Wales qualifications.**
- c) Introducing teacher-assessed literacy and numeracy tests at 16.

iii) Please give reasons and any further comments.

We urge the Welsh Government to be more forward-looking to take account of the fact that the vast majority of pupils are staying in education until they are 18. ATL has consistently argued that there is no need for national exams before then, hence our desire for option B. Having said that in the short to medium term we believe that both option A and option B have merit, we would welcome a review of the assessment of learning in KS4 literacy and numeracy before it is decided to make changes we need to know what is working and in what areas we can do things better. The present system doesn't necessarily evidence that an individual is competent in literacy and numeracy. As previously stated in A2.4.

Question B4.2

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Please give reasons and any views on how this might be achieved:

We would welcome a measured approach, learners should be provided with the appropriate support to achieve their full potential, in some students this may not be level 2. We do however see merit in providing routes (with the aim) for the learner to achieve level 2 through a bite-size approach as a mechanism for the learner to have the opportunity to gain level 2.

Question B5.1

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Should the Welsh Baccalaureate be graded at Intermediate level in due course?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Question B5.2

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) What are your views on the amount of 'terminal assessment' that is appropriate (it is currently 40 per cent)?

We believe that terminal assessment should be appropriate to each subject, dependant on the practical aspect of the subject.

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

We would require more information on the rationale for adopting this model.

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

We support the benefits of controlled assessment as the mechanism for practical subject assessment. We voice our concern that controlled assessment has become a laborious time-consuming exercise for teachers and a lengthy exercise for students under exam conditions. The appropriateness of the amount of controlled assessment is different in each subject.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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vi) If yes, should controlled assessment be retained for most GCSEs or only for some?

Most	<input type="checkbox"/>	Some	<input checked="" type="checkbox"/>
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Question B5.3

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

We agree this should be retained.

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

We do not support this view, a return to O level/ GCSE model would be damaging to students education/ progression.

Questions B5.4

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) If yes, what should this maximum number be?

This would be dependent on the resources available to the school to be able to offer the number of GCSE's . We support a school that has the resources to offer a breadth of subjects as long as there is no expectation that the student is required to embark on studying for a maximum number of GCSE's (such as 13 or 14). We believe the emphasis should be on quality of provision with suitable resources and not quantity. We believe that some students wish to study more than 11 GCSEs because they are under the mistaken impression that this will boost their chances with universities. Schools should draw pupils' attention to the constant reiteration by HE that this is not the case.

Question B5.5

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Should A level learners be able to take modules before the end of the course (AS and/or A2)?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iii) Should learners be able to retake A level modules to improve their grade, without having to resit the whole qualification?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) If yes, should the best mark or the most recent mark count?

Best mark	<input checked="" type="checkbox"/>	Most recent mark	<input type="checkbox"/>
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v) Should retakes of modules be limited to one per module?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Question B5.6

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Question B5.7

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Do you agree that at 14–16 vocational qualifications should be broad-based and not attest to occupational competency?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iii) Do you agree that only IVETs are appropriate at 14–16?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) What are your views on expanding the use of the GCSE brand across vocational and general subjects?

We see no benefit in this change. The name of the qualification is not important – it is the quality of the qualification that needs to be valued. If the IVET approach is to be taken forward, Wales needs to develop an overall strategic approach to this, ensuring that all qualifications admitted into any framework developed are of high quality, fit for purpose and have robust assessment arrangements.

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

We can support some externality in the assessment of vocational qualifications, but not for all. The requirement would need to be taken of the type of vocational qualification; benefit could be gained from external assessment in evidencing a vigorous assessment. Sampling should provide sufficient robustness in assuring quality.

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

We believe it would be essential for external assessment to be identical across examination boards.

Question B5.8

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) In what circumstances or sectors might CVETs be appropriate?

CVETS could be appropriate in the circumstances to gain qualifications whilst working. The service sector, for example hospitality, would be appropriate for CVETs.

Question B5.9

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Please give reasons and any views on the kind of external element you think should be used.

Some elements would lend itself to controlled assessment, such as hard skills like computer literacy, whilst other elements are better evidenced through a portfolio of work such as soft skills.

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) Please give reasons.

It would not be possible to grade at present with the existing standards. A review of this may be appropriate, if there were changes to standards this would need to be managed within the literacy and numeracy framework.

Question B5.10

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) If so what should they be called?

A title that reflects the skills acquired would be better suited, such as Skills for Employment.

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

We feel it could include content that assess a different set of skills that shows business acumen to support free enterprise such as leadership.

Question B5.11

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) Are any changes needed?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iii) Could any of the proposals in this consultation paper impact adversely the provision of appropriate qualifications for less-able or less-engaged students?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please give comments.

As we have stated in response to question B4.2 and B5.3, moving to level 1 and level 2 GCSE's would not meet the needs of less-able or less-engaged students who do not gain threshold levels. To meet the needs of entry-level learners we would encourage the Welsh Government to engage with specialists to consider how the provision can be better met. The appropriate resources need to be retained to continue funding for entry-level learners to have a secure pathway to achieve the level.

Question B5.12

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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If yes, what would they add?

We consider QALL units have a place within programmes of learning for lower ability pupils or pupils accessing education through specialist provision. We may wish to consider making the programme more sector-based e.g. hospitality, to be able to be more specific and relevant to the area of employment.

Question B5.13

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

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Question B6.1

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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ii) If not, please explain why.

We are concerned with the relevancy of this question. It seems obtrusive to consider the requirements of government reporting system when we should be considering the design of qualifications linked to the needs of the learner.

iii) Do you think there should be any changes to the post-16 measures?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) If yes, please outline what these should be.

We are not able to qualify a response as there is not enough evidence available in which to provide an informed answer. It may worth investigating the removal of the average wider points score. A common system of reporting post-16 outcomes is needed, across different types of learning settings.

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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vi) If yes, please outline your suggestions.

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Question B6.2

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) If not, why not?

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iii) Do you agree with our proposal to continue to count qualifications that are smaller than a GCSE (for example, GCSE short course or vocational qualifications of similar size) in performance measures?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) If not, why not?

Agreement is based upon the consideration that the ultimate value of short courses to the individual can be beneficial motivationally and will be beneficial to curriculum contribution. The requirement for a pupil to mandatory undertake a short-course in welsh second language is questioned as providing little contribution to the curriculum and small value to the individual.

Question B6.3

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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ii) If not, what limit (if any) would you suggest, and why?

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iv) If not, why not?

Question B6.4

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

Very important	<input type="checkbox"/>	To some extent important	<input type="checkbox"/>	Not very important	<input type="checkbox"/>	Not at all important	<input checked="" type="checkbox"/>	No opinion	<input type="checkbox"/>
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While some comparisons need to be made, more useful comparisons would be those provided by international studies.

Questions B7.2

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

i) is 'fit for purpose'?

To a great extent	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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ii) influences the behaviour of centres in terms of the specific qualifications they choose for their learners?

To a great extent	<input type="checkbox"/>	To some extent	<input checked="" type="checkbox"/>	Not much	<input type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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iii) impacts on grades, standards or outcomes?

To a great extent	<input type="checkbox"/>	To some extent	<input type="checkbox"/>	Not much	<input checked="" type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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iv) impacts on the provision of Welsh-medium qualifications?

To a great extent	<input type="checkbox"/>	To some extent	<input type="checkbox"/>	Not much	<input checked="" type="checkbox"/>	Not at all	<input type="checkbox"/>	No opinion	<input type="checkbox"/>
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v) Can you suggest an alternative model which you think might be preferable to the current system?

We believe we need the qualifications model to have high standards and offer relevant subjects that are attractive to students and provide a qualification that employers recognise and value. The Government should listen to practitioners and their representatives and recognised employer groups to formulate the needs of Welsh students in the 14 – 19 qualification system. A qualifications system must be structured to evolve organically for the needs of the student and not be changed for political or populist reasons.

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

Both

Questions B7.3

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

We support regulation and quality assurance as vital components for any qualification. It is essential that students have the confidence that the qualification they study will result in the required outcome. Future regulation and quality assurance should compare vocational qualifications with academic qualifications and not just the comparability across exam boards as is presently prominent. It is absolutely essential that future regulation should be independent of Welsh Government.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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iii) If so, for what purposes should they be able to deliver seminars?

We would welcome the continuation of this practice. Seminars provide Continued Professional Development opportunities to teachers and offer explanation of the specification and the rationale for the formulation of questions and subsequent marking schemes in relation to the specification.

Awarding bodies have become more sophisticated in providing practitioners with appropriate information through specification documentation and in listening to the views of practitioners who deliver the qualification. The sharing of information has been fundamental in raising standards – the delivery of seminars supports this.

However, we believe that such seminars need rigorous monitoring not simply to ensure that they are not imparting restricted information, but also to ensure that no schools are being excluded from them.

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

We do not advocate over-reacting to a previous breach. We offer the expectation that there is a charter in place and training of those facilitating the seminar to be responsible for all those attending seminars, in whatever capacity, to understand that the security of the system is imperative and what the consequences are for breaching security.

If it was considered necessary there may be a role for Estyn to conduct spot checks.

Additional comments

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

If new GCSE level qualifications for England become a reality and the GCSE brand continues to be used in Wales, we ask that the Welsh Government undertake a widespread communication campaign to ensure that the qualification's status with respect to equivalent qualifications outside Wales was clearly understood.

We would welcome the Welsh Government provide clarification on CPD and accessing training provision if their centre entered for qualifications from England and not Wales.

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