

14–19 Learning Pathways Policy: the way ahead

Consultation response form

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Responses should be returned by **4 December 2013** to:

Subject Support 7–19 Branch
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Department for Education and Skills
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Cathays Park
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or completed electronically and sent to:

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Proposed changes to Regulations

In taking forward the Task and Finish Group's Recommendations 1, 2 and 3 the Welsh Government proposes to bring about new Regulations under the Education Act 2002 (as amended by the Measure). It is anticipated that those regulations will be made early in 2014 with a view to them coming into force (i.e. have legal effect) on 1 September 2014.

This would involve new laws which reduce the minimum number of courses required at Key Stage 4 to form a local curriculum offer from 30 to 25. Correspondingly, the minimum vocational element would reduce from five to three. Schools would still be able to offer their learners more than the legal minimum, including that for vocational provision; something which most schools already do. Through such a change all schools would, however, be afforded greater flexibility to help them focus more on the quality of the offer and the local needs of their learners and areas.

The points scoring system set out in the Measure, having now served its purpose, would be withdrawn at both Key Stage 4 and post-16.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	x <input type="checkbox"/>
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Please give your reasons for your answer.

In most schools, Course Option Offers for Sept 2014 are in place by early January and preparation for the deadline in January 2014 is already well in hand. Some members felt that there needs to be consideration of the post-16 requirement remaining as 30 plus 5 vocational courses

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	x <input type="checkbox"/>
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Please give your reasons for your answer.

See response to Question 1 above. Many schools already offer in excess of 5 subjects as being appropriate to the learners' needs. A reduction is therefore meaningless.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	x
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Please give your reasons for your answer.

See previous answers

Proposed changes to funding arrangements

In taking forward the Task and Finish Group's Recommendations 4, and 10–14 (relating to future funding arrangements) the Welsh Government proposes to evolve the current funding arrangements to local authorities over the next financial year. This would form a transitional year between current regional 14–19 grant funding and future funding arrangements to regional consortia.

The Group's recommendations set out an appropriate route through which current funding arrangements can be refreshed and brought more in line with wider developments around regional consortia working and support to schools. The same approach should be applied in terms of post-16 funding, with the need to adjust the current 14–19 Learning Pathways revenue grant to reflect the introduction of the new post-16 planning and funding System and Learning Area Programmes from September 2014.

In taking forward these changes, the objective would be to make 14–19 deliverable and sustainable beyond 2014–15. More harmonised management arrangements within consortia would aid reduced administrative costs, while also making best use of the data flows available on school improvement and 14–19 to strategically plan and target interventions on areas most in need. This is essential to make best use of finite resource.

The Group identified a minimum funding level of £10 million necessary for the transitional period in 2014–15. This has been accepted by the Minister for Education and Skills, and £10.241 million has been provisioned for this purpose in the Welsh Government's draft budget announced on 8 October 2013. An indicative sum of £8 million has been set aside for 2015–16, which also reflects the figure arrived at by the Group.

It is proposed that priorities for funding through the transitional year include protecting provision for those learners at Key Stage 4 and post-16 already undertaking courses of up to two academic years, and their associated transport. The Welsh Government accepts that within an overall reducing budget total, there is a need to also continue ring-fenced support for Welsh-medium course provision.

It is recognised that the current 14–19 grant, and associated networks, provide some considerable support in areas of learner engagement and preventing young people from becoming not in education, employment or training (NEET). This also needs to be reflected in forward funding arrangements, particularly in support of the [Youth Engagement and Progression Framework](#) implementation.

The Welsh Government has already started work with stakeholders in developing draft guidance for the transitional year and beyond. However, we would welcome your input on the specific questions below.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	x <input type="checkbox"/>
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Please give your reasons for your answer.

Members report that many schools are already using PDG funding for new vocational areas and learner support. They also comment that SEG is almost negligible anyway.

ATL Cymru would welcome a further relaxation of constraint on grant funding and we believe this proposal would not cause difficulty on this timescale. We believe schools should have greater freedom to spend where the spending can do most good. At present there is no certainty that the Learning Coach function is the most effective use of funding and research is needed here.

However, ATL Cymru is adamant that the separate and identifiable funding streams must remain and not be subsumed into a general budget at some time in the future, thus paving the way for further cuts to already squeezed budgets.

Question 5

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	x <input type="checkbox"/>
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Please give your reasons for your answer

While we have supported this in principle it is too early to assess the effectiveness of planning at Regional level. Once the work at Regional level has been established it will be easier to assess what can be done. Members are still not, by and large, experiencing the benefits that regional working should deliver. The current proposals do not recognise the higher costs of offering STEM A levels as a priority area.

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

Agree	x <input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Please give your reasons for your answer

ATL Cymru has always argued that that funding should meet identified needs. However, problems arise when the needs exceed the available funding. A needs-based approach would be best provided the needs are accurately represented in the model. To be frank for many A level students, a local labour market needs analysis is largely an irrelevance, as they are considering national or international trends and often move away to university. The current proposals for the new NPFS do not recognise the higher costs of offering STEM A levels as a priority area.

The targeting of funds is potentially problematic and contradicts the principle underpinning Question 4 allowing schools greater discretion in their use of funds. The planning guidance should start from an analysis of the intended outcomes as any targeting, performance measurement or funding model will always influence school behaviour. As soon as models and plans favouring one route or another with funds or recognition are introduced, not only must someone manage this process, and we have seen in the past that schools modify their behaviour, often in unhelpful ways.

Proposed delivery changes

In taking forward the Task and Finish Group’s Recommendations 5 and 6 the Welsh Government proposes to bring about changes through guidance documentation and funding terms and conditions on how 14–19 business is planned and delivered; notably both in respect of the approach to learner travel and the administration of the current grant.

There is already a requirement in planning guidance for curriculum planners to fully explore the potential to use modern technologies to avoid learners having to travel

(and also the movement of course deliverers in the first instance). However, there is a need for increased scrutiny of planning for learner transport. We need to increase the sharing of existing best practice and realise efficiency savings through more effective approaches.

We recognise the need for some learner travel undertaken as a result of local collaborative provision, but learner travel should be seen as the last resort solution after viable alternatives have been fully and demonstrably explored. The increasing costs associated with this element of the 14–19 grant is simply not sustainable moving forward.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Please give details.

Members report that as soon as students realise that they have to travel for certain courses, many modify their selection of courses to avoid it, or move to a school that is big enough to not need to bus its children around the region.

The cost of transport is another consideration. Transport is expensive, complex to organise, and in a rural area can lead to unreasonable travel times or sometimes impossible journeys.

It should also be noted that the collaborative provision of subjects is fine in principle but in practice has had an effect on the rest of the curriculum for the majority of other students. For instance, providing an afternoon a week during which collaborative delivery can take place restricts what the other students can do in school; this in turn has an effect on KS3 curriculum delivery. The Welsh Government suggests that collaboration can be used to deliver other subjects that are under pressure within the curriculum to cut costs e.g. MFL courses. This may be financially appealing but is pedagogically flawed. Language teachers argue that language teaching is best delivered little and often.

Proposed developments on qualifications

In taking forward the Task and Finish Group’s Recommendations 7 and 9 we propose to test these approaches via the Review of Qualifications for 14 to 19-year-olds in Wales stakeholder groups. However, at this stage we would like your views on the potential for developments around broad-based (generic) vocational two-tiered (Level 1 and Level 2) vocational (IVET) qualifications, and for select courses relating to occupational competence being available as IVETs. Implementation would need to reflect wider stakeholder views and existing work already programmed through the Review of Qualifications for 14 to 19-year olds in Wales.

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

Agree	x <input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Please give your reasons for your answer.

ATL Cymru believes in principle that the idea of IVETs is a good one for a certain cohort of students. Care would need to be taken to ensure that such courses were valued appropriately and did not cause schools to ‘game’ with qualifications by putting the wrong students through these courses.

The implementation of the Learning and Skills (Wales) Measure 2009 has increased the choice offered to learners by schools and colleges. There are good examples of additional courses being offered to cater better for students that previously may have been overlooked, for example, level 1 vocational courses offered in collaboration with an FE institution. However, the pressure of targets and level 2 threshold, etc is in the opposite direction. In addition there are examples of schools offering inappropriate courses that generate little genuine demand from students taught by staff with little understanding of the course structure or the subject and have been added to the menu merely to achieve the arbitrary 30 options.

ATL Cymru is in favour of providing appropriate qualifications to meet the needs of learners. In recent times, qualifications have been used to judge schools and teachers and so we have seen an increase in “game playing” with qualifications to the longer term detriment of the learners. ATL Cymru believes that broader based vocational courses at 14 would be a good idea as we currently ask 13/14 year olds to make life-changing narrow option choices.

Proposed communications approach

The Task and Finish Group’s Recommendation 8 suggests that the Welsh Government develops a broader communications strategy around changes affecting 14 to 19-year-olds. We accept that there is merit in considering how we communicate the interconnectivity between the various programme changes taking place affecting 14–19, and how we can better help stakeholders understand how the various actions interact and support each other.

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

Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Please give details.

ATLCymru believes that the key is a single joined-up message covering all policy areas affecting the sector. There must be one narrative. Dividing into teams with each team communicating about its own area of responsibility is not helpful as the issues within disparate teams have interlocking impacts at the school level. The model being used by those in charge of the communication strategy for Qualifications Wales is a blueprint to be commended.

General comments

We would like to take this opportunity to invite any further comment on the proposals being put forward within the Task and Finish Group's report.

Question 10 – 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.

Please give details.

Members comments included:
 Clarification is needed regarding who is responsible for the behaviour of pupils, particularly when there are students from different schools with little or no direct supervision.
 Synchronised timetabling is an issue that can lead to the timetable being written for a relatively small proportion of the cohort and being detrimental to the vast majority.
 The suspension of NPFS has meant that money no longer follows students. This has been a disincentive to larger institutions providing the additional courses to their smaller neighbours.
 The management time invested in collaboration is out of all proportion to any benefit. If meetings were properly costed as well as including the transport costs, the true cost of collaboration would be seen.
 There are still unresolved problems regarding pastoral care. Colleges usually refer issues back to the home school to be dealt with. The differing rules and culture of a school and college can cause confusion. Many college staff have relatively little experience of dealing with the 14 year old age group which can prove difficult. One member in FE commented that in their area a fair amount of training had been provided to staff dealing with the 14 year old age group. There may be a longer term need for a different contract for staff delivering sessions to 14-16 year olds. There are also issues around monitoring student progress and behaviour across institutions

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

