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## Consultation – summary of responses

### Review of Qualifications for 14 to 19-year-olds in Wales – qualitative summary

Date of issue: November 2012

# Review of Qualifications for 14 to 19-year-olds in Wales – qualitative summary

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| <b>Audience</b>            | Anyone with an interest in the Review of Qualifications for 14 to 19-year-olds in Wales.   |
| <b>Overview</b>            | A qualitative summary of consultation responses from the Review of Qualifications for 14 to 19-year-olds in Wales.   |
| <b>Action required</b>     | None – for information only.   |
| <b>Further information</b> | Enquiries about this document should be directed to:<br>Review of Qualifications 14–19<br>Qualifications and Learning Division<br>Department for Education and Skills<br>Welsh Government<br>Tŷ'r Afon<br>Bedwas Road<br>Bedwas<br>Caerphilly<br>CF83 8WT<br><br>Tel: 01443 663725<br>e-mail: <a href="mailto:reviewofquals@wales.gsi.gov.uk">reviewofquals@wales.gsi.gov.uk</a> |
| <b>Additional copies</b>   | This document can be accessed from the Welsh Government's website at <a href="http://www.wales.gov.uk/educationandskills">www.wales.gov.uk/educationandskills</a>  |
| <b>Related documents</b>   | <i>Review of Qualifications for 14 to 19-year-olds in Wales</i> consultation paper (2012)  |

This summary was produced for the Review of Qualifications for 14 to 19-year-olds in Wales by Arad Research Ltd.

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# 1 Introduction to the Review and the report

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In aiming for a 2013 statement on policy directions for qualifications for 14-19 year olds the Welsh Government has committed to working with key stakeholders to identify the most relevant qualifications, their availability, value and purpose through a wide-ranging consultation exercise. The Welsh Government's Qualifications and Learning Division commissioned Arad to write a report summarising all feedback received during the formal consultation period of the Review of Qualifications 14-19 in Wales and any other stakeholder feedback received after that time.

The Review has six themes: Relevance; Value and Quality; Assessment; Measurement of Performance, Future Proofing and the relationship between qualifications, literacy and numeracy. This report summarises the views of a wide range of key stakeholders relating to these themes.

187 separate submissions were received<sup>1</sup>. Just over two thirds responded using the consultation form. The submissions included,

- 33 responses from schools or teachers,
- 27 from employers or employer representatives,
- 18 responses from parents,
- 18 responses from awarding organisations,
- 13 FE colleges
- 11 HE institutions,
- 2 learners,
- Other stakeholders including trade unions, local authorities, training organisations and charities.

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<sup>1</sup> Five individuals /or organisations provided two sets of evidence, one in response to the consultation document and one the consultation document and one response for the evidence day. Furthermore, the team received more than one submission from a handful of organisations (e.g. a couple of schools) while other responses were a collation of several views or, in some cases, a coordinated organisational response involving consulting a range of stakeholders.

## 2 Summary of responses

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### 2.1 A vision for the future of qualifications in Wales

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The Review proposes a vision for the future of qualifications in Wales and the vast majority of respondents to the written consultation process support this vision, with 94% agreeing with it. Respondents from all sectors welcomed the wide-ranging focus on the needs, culture and education traditions of Wales outlined in the vision. They also welcomed the specific support for equality of learning opportunities, the development of the skills for all young people and a focus on the professionalisation of the future workforce in Wales.

The current challenge outlined by many respondents, and which the 14-19 Review vision is aiming to address, is to ensure that learning provision and qualifications meet the needs of learners, employers and gatekeepers in terms of content, quality and also sufficiency. There was also strong support for the need to support all learners 14-19 in their personal and social development as well as educationally, providing them with the appropriate skills, knowledge and attitudes to make a positive contribution to their communities and the economic prosperity of Wales.

There was also widespread support from all sectors for the need for qualifications in Wales to have value, relevance and portability within a comprehensible and flexible system which attracts students to continue in education. Accordingly, there were calls for the qualifications system to reflect and support a curriculum that is relevant, interesting and with clear outcomes and appropriate pathways to further learning and/or employment in order to engage, challenge, support and motivate learners irrespective of ability.

*“Given the core function of qualifications in the formal accreditation of learning and the implications this aspect of the system has for the future education, employment and training prospects of young people, it is essential that this framework is established on a coherent, credible, efficient and equitable basis.”* **NASUWT**

*“A more flexible system needs to be supported by a robust initial diagnostic assessment of learners to identify their understanding, capability and employment interests and match them to the qualifications that will best suit them.” Agored Cymru*

There were also calls for the vision to address these value and portability issues through wider collaboration and cooperation with the rest of the UK, and for an additional focus on transferability of qualifications for UK-wide and international learning and employment opportunities. In addition, there was cross-sectoral agreement on the need for the Welsh Government to ensure that Welsh students have the same access to quality, relevant and recognised qualifications as well as the broad range of progression pathways available to other students across the UK.

## **2.2 Keeping recognisable qualifications ‘brands’**

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While there is broad agreement for the notion that the qualifications system in Wales needs simplification and rationalisation there is widespread support (among 87% of respondents) for keeping known, recognisable ‘brands’ such as GCSEs, A levels, BTECs and City & Guilds, at least in the short to medium term. The majority of respondents considered that this would give learners, parents, providers and employers continued confidence in the system as well as continuing to build on previous investment in these qualifications and the system that supports them.

Cross-sectoral support for the retention of GCSEs was very high with 95% supporting the retention of these qualifications. Respondents outlined a wide variety of views in favour of the support of the retention of GCSEs. GCSEs are considered by these respondents to be recognised by employers, further and higher education institutions, parents and learners in Wales as well as at a UK and international level. It was also agreed that they provide learners with an understanding of their strengths and weaknesses which may inform direction of travel in regard to further learning and/or employment.

*“Changing the branding too quickly may result in more confusion than clarity. If one of the purposes of the Review is to improve the recognition of and value attached to qualifications, then there is a strong case, in the short to medium term at least, for*

*retaining brands such as GCSE and A level since they are generally well known and are considered reputable.”* **Careers Wales**

*“These are well known brands with employers who understand what they are, changing the brand will require a major communication and re-education which will take a long time. The brands have not been identified as an issue it is the content within them.”*

**Skills Active**

## 2.3 Developing GCSEs in Wales

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While support for the retention of GCSEs is strong there was some division of opinion as to the best way forward for the Welsh Government for their future development. Given three options almost 50% of respondents supported Wales retaining the brand name of GCSE, but to develop Wales-only, high-quality and rigorous GCSEs to reflect the curriculum in Wales. In contrast, almost 20% of respondents supported developing completely new, high-quality and rigorous qualifications (not called GCSEs) for 14 to 16-year-olds that reflect the curriculum in Wales. The remaining third of respondents support the option of Wales adopting GCSE developments as and when they emerge in England.

In a further breakdown of these results, employers and employer representatives were more in favour of developing Wales-only GCSEs, awarding bodies and parents much more in favour of Wales adopting developments in England while school representatives' opinions were mixed, mirroring the range of views expressed by other respondents.

Needless to say these responses were provided before the recent developments in England with the proposed abolition of GCSEs and the introduction of a new Level 2 English Baccalaureate in 2017. Given that the strong majority of respondents still support the two options of either brand new qualifications for 14-16 year olds in Wales which reflect the curriculum and educational culture in Wales or the development of high quality Wales-only GCSEs there is an opportunity for the Welsh Government to use these recent events to potentially drive change in Wales along these lines.

*“Retaining the GCSE and A Levels in light of a decision in Westminster could in fact strengthen the reputation of Welsh qualifications, as it will be retaining a highly respected and reputable qualification in contrast to England’s divergence.”* **National Union of Teachers**

There was also broad support for continuing to make GCSEs available on a unitised basis with 61% agreeing against only 10% who disagreed. It was considered that this approach has clear motivational benefits for learners and can enable them to build on success or further adapt their learning to improve their performance. There were suggestions that units could therefore be developed for every subject that contextualise or vocationalise learning in these subjects. This approach would have additional benefits in terms of enhancing relevance and providing the opportunity for further differentiation, and help break barriers between academic and vocational subjects.

## **2.4 Retaining A levels**

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Over 70% of respondents considered that A levels are currently fit for purpose. A levels are considered essential currency for access to HE and the ‘gold standard’ in terms of qualifications for 16-18. HE providers outlined that they remain the most common unit of measurement used to set entry requirements, advise learners, teachers and advisers, make conditional offers and make admissions decisions. It was also noted by a range of respondents that the A level is a viable qualification in its own right and that moves away from this qualification could potentially restrict participation and increase the complexity of the system.

For those respondents who considered that A levels weren’t fit for purpose (6.5%) or those who were not sure (23%) there were views outlined that there is still too much of a focus on A levels in schools as the main post-16 option for learners. Several respondents also questioned whether they were less relevant than they should be for employers who do not employ graduates. One respondent also outlined that A levels or their equivalent could be made more fit for purpose by better preparing young people for higher education through increasing the element of independent research.

*“The A Level remains a robust and well regarded qualification.”* **OCR**



*“They (A levels) are well-designed courses of study leading to a qualification which is probably the best understood by parents and employers.” NAHT Cymru*

## **2.5 Retaining AS levels**

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There was strong cross-sectoral support for retaining AS levels as a stepping stone to A levels (assuming that they continue in Wales) with 73% of respondents in agreement. Universities and their representative bodies reported that AS levels have significant value for HEIs in making choices between applicants. Respondents also outlined that AS levels have value in their own right as well as an essential lead in towards A levels. They were also considered to provide additional breadth of choice in the curriculum for learners who may wish to study in several different fields.

## **2.6 Welsh Baccalaureate Qualification**

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Overall consultation responses outline strong support for the Welsh Bac. It is a well regarded qualification for many respondents with relevant structure, framework and content. There was praise for its greater focus on employability at advanced level, its promotion of research and analytical skills and its community participation element to provide more rounded education. The interface between the range of qualifications and the key skills was considered as relevant and motivating qualification for students and its flexibility was also highlighted as a positive element.

*“The Welsh Baccalaureate is an excellent vehicle for delivering all of the skills young people need for employment and learning in many SSA but not all. Many learners find it highly motivating, particularly at Foundation and Intermediate levels. For A level students it broadens the educational experience of the students and gives a wider general education base.” FE College*

*“The Welsh Bac has shown to be successful in keeping the core of a qualification, ensuring it translates with the other qualifications internationally and has specialisms in*

*certain areas which have been informed by employers e.g. the Principal Learning qualification.”* **Creative Skillset Cymru**

*It is a highly valued qualification which provides opportunities for skill and knowledge development not met by the qualifications framework. Assessment is sufficiently flexible to allow institutions to plan delivery models based on local circumstances.* **School**

There were nevertheless some comments from a small number of respondents outlining that students find the Welsh Bac work meaningless and repetitive and lacking academic challenge. There were also calls for greater flexibility with the Foundation and Intermediate levels for employed-status learners and for caution with the vocational elements taken at 14-16 which were considered by some to be too specialist and requiring a broader approach. There were also concerns about the variation in delivery models at advanced level which respondents outlined should be addressed to ensure greater quality assurance, academic weight and potential for recognition at a wider level.

There was therefore some division in opinion regarding whether Welsh Baccalaureate Qualification should be universally adopted. Just over a third (35%) of respondents were very much in favour of this option while another 30% considered that it should at least be adopted to some extent e.g. remaining as an ‘envelope’ qualification but with a compulsory ‘core’ focused on essential skills. A minority (15%) were completely opposed to any mandatory adoption expressing additional concerns regarding UCAS tariff, students wishing to do four A-levels and variable standards relating to how individual school provision is currently designed and delivered.

In a further breakdown of results Local Authorities (14-19 Networks and Education departments) were the most supportive of universal adoption while schools and teachers were also in favour. Employers had views in line with the average while parents and awarding bodies were more opposed to the proposals.

Just under half (45%) of respondents consider the Welsh Baccalaureate should be graded at Foundation level in due course while 29.5% were against. There was more support for grading

the Welsh Baccalaureate at Intermediate level in due course with 55% agreeing and 20% disagreeing. Those in support considered that this approach would give more worth to the qualification as well as more recognition within the curriculum. The potential for grading of the Advanced Baccalaureate had strong qualitative support as it has the potential to allow learners to demonstrate their achievements and enable employers and HE admissions systems to better understand their progress and achievements.

At both Foundation level and Intermediate level, schools and employers were more likely to consider that the Welsh Baccalaureate should be graded, with 78% of schools or teachers and 66% of employers in agreement with grading at Intermediate level for example.

## 2.7 The value of vocational qualifications

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There were numerous concerns expressed by respondents about the perception of the value of vocational qualifications especially in comparison with more ‘academic’ qualifications at level 2 and 3. While the consultation document has not used the term specifically there have been further calls for vocational and academic subjects to have ‘parity of esteem’ which will allow students and parents to have confidence in their value.

The responses did not elaborate on whether this ‘parity of esteem’ related to the fitness for purpose of each qualification in providing a valued pathway into, for example, a higher education course or an occupation – or whether ‘parity of esteem’ implies that all qualifications at the same level should be seen as equal in the intellectual challenge they present. While there was strong cross-sectoral support for current vocational ‘brands’ there was also a wide range of views regarding their current fitness for purpose.

Again, among the large majority of respondents there was strong support for the need for vocational qualifications to have value and portability and also for a clear division between pre- and post-16 vocational qualifications. It was considered that 14–16 vocational qualifications should be broad and appropriate for that age group, reflecting a balance between learning,

understanding and skills without offering occupational competence. In a sense respondents are thus viewing them as general education.

Almost 80% of respondents agreed that at 14–16 vocational qualifications should be broad-based and not attest to occupational competency. It was generally considered that post-16 vocational qualifications, by contrast, should be more specialised and focused on industry requirements and standards, competence in subject matter and applied learning with a view to achieving a pathway to further vocational learning such as apprenticeships or directly to employment.

## 2.8 CVETs and IVETs

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More than seven out of ten (72%) respondents considered that Wales should adopt the IVETs and CVETs definitions for vocational qualifications and there were also suggestions that aligning IVET / CVET system should be examined as a means of providing further comparability with European standards. 55.5% agreed that only IVETs are appropriate at 14–16 while 20% disagreed, those in support pointing to its positive aspects such as the focus on employability and broad-based qualifications for 14-16 year olds. 82% of respondents agreed that both IVETs and CVETs could be appropriate for 16 to 19-year-olds while only 2% disagreed.

This was outlined by those in agreement to be particularly the case for those young people in Wales who do not go to university or undertake apprenticeships but want a more flexible and/or varied programme of study at this age. CVETs were also considered appropriate where learners are clear on their chosen career pathway, those undertaking substantial and real work in a voluntary capacity or employed status learners. There was also general agreement that they should be a progression from an IVET for the development of sector specific skills, either freestanding or in combination with an apprenticeship.

*“Vocational qualifications play an important role for adults too. Those whose initial schooling failed to instil a habit of lifelong learning are often motivated to return to education through vocationally-oriented courses”.* **NIACE Dysgu Cymru**

## 2.9 “Equivalence” of vocational qualifications

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For a number of respondents there should be no attempt to equate vocational qualifications with academic ones due to wide differences in their assessment and teaching procedures and in purpose. A typical view was that the value of qualifications should not be based on size or academic equivalence e.g. how it compares to a GCSE but on the purpose of the qualification. However 56% agreed with the Review’s proposal to introduce a limit of two GCSEs ‘equivalence’ for vocational qualifications in performance terms. 29% disagreed, considering that more importance should be given to a case by case approach and ensuring where equivalences are set, they are as accurate as possible.

Awarding organisations were less in favour of the proposal but otherwise there was no significant difference in views between the different groups of respondents.

The Review’s suggestion regarding the limitation of 40% curriculum time to vocational subjects and on the contribution of vocational qualifications to the Level 1 and Level 2 performance measures also divided opinion. Those against argued that while this may not affect many young people directly given the extent of time devoted to core subjects it would affect those who are most disengaged. They considered that this option would disadvantage learners who are more suited to taking vocational routes and that these learners should have the most appropriate routes, content and structure for them without artificial limits.

*“A limit of 40% time and contribution to the Level 2 threshold would be a body blow to the idea of parity of esteem between vocational and other subjects: their limited currency value would be a clear statement by the Welsh Government that vocational subjects are inferior to other subjects.”* **Denbighshire County Council**

## 2.10 Reducing number of qualifications 14-19

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Just over two-thirds (68%) of respondents supported the view that the number of qualifications approved for public funding at ages 14–19 should be reduced. This was in line with further

strong qualitative comments outlining the need for simplification and rationalisation of the system and a focus on the need for all qualifications to be robust and appropriate and to be recognised and valued by learners, providers and employers alike. There was strong support therefore for discontinuing qualifications that do not add sufficient value to employability or progression potential alongside a cutting back in brands to make the system clearer, manageable and more comparative with other parts of the UK.

*“We are much less convinced about the retention of the brands for vocational qualifications. This system is more attuned to the commercial development of awarding organisation rather than offering coherence, understanding or information to employers. In child care a couple of brands are recognised by employers; in social care there is less relevance or recognition.”* **Care Council for Wales**

*“There is considerable confusion amongst employers currently as to the range of qualifications available. Name changes would be cosmetic in the absence of wider structural reform.”* **CITB Construction Skills Wales**

In contrast awarding bodies themselves outlined that the wide variety of learners and their interests and career structures are constantly changing. They also noted that the progression aspirations of learners are very varied and require the development of different knowledge and skills that specifically support those aspirations. For these reasons they considered that any reduction would therefore need to be with caution and that reducing the number of qualification or imposing tight constraints or structures on the qualifications systems could limit these progression opportunities.

*“Simplification (of the system) does not necessarily take account of wide range of learner needs and aspirations and the wide range of 14-19 provision. It is more important to focus on value of qualifications for learners and whether they can contribute to future vision of Wales”.* **Federation of Awarding Bodies**

## 2.11 Criteria for retaining qualifications

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A number of key options were outlined by respondents which detailed their views on what should be the criteria for retaining a qualification in the list approved for public funding. These included being in line with Welsh Government policy and vision for 14-19; being accredited by a regulator; retaining the support of employers and other stakeholders; offering meaningful progression to learners; leading to occupational competence, recognised as a progression route to further learning; relevance to respective sectors and reasonable level of take up after a set time period of three years. It was considered that all of these aspects could provide confidence for learners and employers and demonstrate that qualifications are the route to career progression.

While few specific examples of qualifications that should no longer be made available were given respondents did provide comments regarding criteria for removal of qualifications. These included qualifications that have not been used for 3 years; qualifications that continue to recruit numbers below a certain threshold year on year, if it duplicates other qualifications/specifications; qualifications pre-16 that encourage a high degree of specialisation; if LMI does not support the value of the qualification and if it is outdated and is no longer in line with technological or subject-specific advances.

While these suggestions addressed a broad range of criteria for reducing the number of qualifications some respondents, among them awarding bodies, outlined the dangers in relying solely on numbers-based criteria. This was considered to be particularly relevant regarding qualifications that are potentially important economically for Wales but are niche or specialist and would potentially be cut using these criteria. This could lead to young people in Wales having to study for certain specialist subjects in England, or further afield.

*“A balance needs to be struck, however, between flexibility and clarity. If the choice of qualifications is rendered too narrow it will reduce Wales’ ability to respond to employer needs at a local level or meet specific individual needs.”* **Grŵp Llandrillo Menai**

## 2.12 Qualifications and coherent programmes of learning

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There was majority support for the proposal that qualifications should be funded and delivered through coherent programmes of learning at 16–19, rather than as individual qualifications. 55% of respondents were in agreement with this while 18% were against, with, again, a strong minority of those not sure, 27%. Having this more coherent approach was considered to have the potential to allow structures to support the further development of the Welsh Bac however some respondents noted that this would have issues for part-time and adult learners whose learning needs are likely to be different from those of 14-19 year olds in full-time education.

## 2.13 Wider Key Skills

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Overall, Wider Key Skills were viewed by the majority of respondents in a generally positive light with over 50% considering that they were relevant and valued either to a great extent or to some extent. It was considered that these qualifications have had a positive impact in raising the profile of important skills and further qualitative views highlighted core activities that develop ‘problem solving’, ‘improving own learning and performance’ and ‘teamwork’ as valuable for learners and for employers alike, particularly in their promotion of soft skills.

Almost 30% of respondents considered, however, that they were of little or no value and reasons given for this included that the range of ‘soft’ skills required by learners is far wider than those currently designated as Wider Key Skills. Other qualitative responses outlined that Wider Key Skills are not tested and can be credited without a set amount / level of work completed. It was also considered the skills delivered should be more directly linked to employability and embedded where appropriate within each subject area.

There was support for renaming them to give them greater profile and clarity with Work Skills, Employment-related Skills, Life Skills and Employability Skills being examples offered by respondents. There were also additional suggestions regarding their future potential. Several respondents considered that they had the potential to be an integrated part of the 14-19 learning core in a re-designed Welsh Bac and that this would address issues of lack of testing and weight. Others thought they could be best delivered by embedding into the content of the learner’s programme and that this would exclude the need for assessment.



In a further breakdown of survey results employers and their representative organisations were more positive about Wider Key Skills than teachers and schools (a mix of views) and parents who did not place such a high value on them.

## **2.14 Essential Skills Wales**

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Respondents expressed general support for Essential Skills Wales, although this was qualified in some respects. Almost 20% of respondents considered it was relevant and valued while a further 41% found it had some relevance and value. The emphasis on practical application within the Essential Skills Wales qualifications was considered very relevant, and some considered that it has increased standards and planned progression routes.

As a relatively new qualification there was some agreement that it has had relatively little time to achieve currency with employers and other stakeholders and there was thus support (41% of respondents) for greater external assessment to give a clearer view of standards and provide snapshots of skills levels.

However numerous concerns have been raised relating to its delivery by a sizeable minority (26%) who questioned its overall value. These concerns related to the assessment methodology which was considered to lack rigour; the imbalance of time spent on completing ESW paperwork qualifications in comparison with the time spent on improving learners' actual skills; a lack of focus on transferring these skills to support learning across the curriculum; its standing in comparison with GCSEs and the focus on performance indicators rather than the needs of the individuals. There are also concerns about parents and employers' current awareness of value and content.

In a further breakdown of survey results employers and their representative organisations were more positive about ESW than teachers and schools (a mix of views) and parents who did not place such a high value on them.

*“There are different views within colleges on the extent to which ESW has become valued by learners and employers. It is fair to say that the profile of ESW is not yet fully established in Wales among learners or employers and some practitioners have questioned whether there is sufficient emphasis on numeracy and literacy within the ESW, or whether at a post-16 level ESW needs to be specifically mainstreamed within the academic or vocational qualifications being pursued by the learner.” Colegau Cymru*

## 2.15 Welsh language

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A number of issues were highlighted by respondents regarding Welsh language qualifications. These include issues with lack of availability of Welsh medium provision in vocational areas plus issues such as capacity and teaching skills, inconsistency in quality and range of resources, the limited market, and the cost and resource implications for providers given the recent Welsh Language (Wales) Measure 2011. At a vocational level the shortage of Welsh speaking external assessors, verifiers or moderators of vocational qualifications was also outlined as an important issue as were lack of progression opportunities which can act as a disincentive to choosing Welsh medium options at 14.

Recommendations were therefore offered to address these issues which reflect wider concerns regarding Welsh language provision. These included prioritising and reducing the number of qualifications for the 14-19 age range to enable a more strategic approach to investment in teaching and learning resources in both languages to support these qualifications.

## 2.16 Reducing levels of assessment

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There is concern among a majority of respondents regarding the proliferation of assessments and the subsequent impact on learners in terms of loss of teaching time, interrupting learning and reducing enjoyment. Almost three-fifths (59%) of all respondents considered that the volume of assessment should be reduced against 16% who said it shouldn't and 25% who were not sure. Qualitative responses supporting reducing assessment levels outlined the potential benefits for allowing a greater focus on teaching and learning and the subsequent enjoyment of, and engagement with, learning.

There are also concerns relating to the spiralling costs of external assessment for institutions and whilst it was considered that modularisation is appropriate to motivate learners it was outlined that the assessment burden could be thus reduced by restricting the opportunity to resit modules. While reduction of assessment levels was considered important by the majority there were also views that it was essential to ensure that all assessments are comparable with, and measurable against, others across England.

## 2.17 External assessments

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Just over half (55%) of respondents considered there should be a stronger external element in the assessment and/or quality assurance of all qualifications against 21% who disagreed and 24% who weren't sure. While some respondents considered that external assessment was an essential element of ensuring rigour and the value of qualifications there was also support for the principles of assessment for learning rather than of learning. It was outlined that these principles could be delivered through a balance of external and internal assessment supported by strong and transparent quality assurance and robust controls for Awarding Organisations.

*“It could be argued that fitness for purpose should be the main driver alongside the proper assessment of competence and skills. This can be done by external moderation and appropriate QA systems, and be equally suitable as a means of assessing*

*knowledge, understanding, analysis, evaluation and synthesis. It could also be achieved by externally set and marked tests.”* **Denbighshire County Council**

*“We support the view that external assessment should vary depending on qualifications type and purpose. We do feel that if the standards of external QA are robust and there is a strong approach to standardisation across AOs this will strengthen the perception of the quality of the qualifications themselves”.* **Skills for Health**

*“The changes to the qualification and awarding organisation regulatory systems brought about by QCF and other earlier changes, appear to have weakened the external verification process across all competence based qualifications in our sector. We believe that internal scrutiny is part of the problem, and therefore welcome further and more regular external analysis and benchmarking.”* **Care Council for Wales**

## **2.18 Internal Assessment**

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Respondents considered that internal assessment supported by external quality assurance conducted by awarding organisations can provide a viable alternative to a sole focus on external assessment. It was recognised, however, that if qualifications are assessed internally teachers and other school staff need adequate training to ensure that they have the necessary knowledge and skills to do so robustly. It was also recognised that the external quality assurance delivered by Awarding Organisations will require monitoring and supporting regulatory requirements from the Welsh Government.

There were also proposals for greater levels of self and peer assessment that could be incorporated to help promote initiative taking and the benefits of collaborative work for learners. Some respondents who disagreed with a greater focus on the internal-based assessment approach stated that internal assessment can sometimes lack rigour and fairness and this links to the calls for adequate training for teachers and other school staff reported above.

*“I think there should be less emphasis on external assessment, to reduce the burden of assessment on students and teachers and reduce the loss of teaching and learning time, particularly at 14-16 (GCSE) and 17 AS, however with a greater accreditation and*

*verification of integrated teacher assessment of attainment within and across the curriculum. This could build upon the KS3 Programme of Teacher Attainment”.*

**Education consultant**

*“The problem with internal assessment is just that, it is internal. This puts a lot of pressure on teachers, they are being pulled in two directions. One to represent the child’s ability and the other to get the best results for the school. Somewhat “woolly” assessment criteria are rife and make this easy to see a piece of work “in a good light”, without breaking the rules. The problem with making it more robust is this will just be an increase in paperwork and workload detracting from the more important job of lesson preparation.”* **Teacher**

*“Quality assurance might be more rigorously implemented by centres and awarding organisations if there were not a direct link between funding, income and attainment. Whilst a funding policy linked to attainment is justifiable and successful completion is a measuring tool, the protection of standards needs to be the driver in all quality assurance models.”* **Agored Cymru**

Half (50%) of respondents thought that controlled assessment should be retained as a feature in the next generation of GCSEs in Wales against 16% who disagreed. Qualitative evidence provided by respondents pointed to the introduction of a greater degree of reliability and rigour through this approach. Those that disagreed pointed to logistical problems for schools and that pupils found them difficult and tiring. There were also calls for more awareness of variation in the amount of teacher input in controlled assessments and, again, the need for better information and training for teachers to ensure consistency.

*“Controlled assessment has taken up a lot of teaching time; there is uncertainty and inconsistencies about guidance given and it can be demotivating / confusing for students.”* **Assistant Head teacher**

## **2.19 Amounts of ‘terminal assessment’**

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While a few respondents considered that levels of terminal assessment could be raised to 50% the majority considered that the current level of 40% is currently appropriate. A flexible approach was considered necessary for some respondents, they noted that the proportion of assessment should also reflect the nature of the course being assessed and that where subjects are more practical in nature they may require a higher proportion of coursework.

Arguments put forward for raising the level considered opinions that the current position allows for significant amount of support from parents and this can impact on quality of outcomes for employers as well as potentially disadvantaging some students.

## **2.20 Flexible take-up**

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There was support for the notion of ‘stage not age’ regarding to what extent young people should be able to take qualifications when they are ready rather than at an expected age. Just under a third (29%) of respondents were strongly supportive of this idea whilst 55% also expressed some support depending on the circumstances involved. Many respondents noted that learners develop their skills and knowledge at different ages and that recognition of a wide range of groups, abilities and aspirations of learners is what overall Welsh Government 14-19 strategies are aiming to deliver.

It was noted that many schools already respond to the individual strengths and needs of learners in delivering qualifications across Key Stages 4 and 5. There was thus additional qualitative support for early take-up for learners where abilities allow as well as later take-up. It was considered that both approaches would take account of different learning styles and rates of learning and build confidence and progress. Some concerns were raised, however, regarding the workloads of teachers and the potential pressures on some students, particularly regarding early take up.

It was also highlighted that if a system was developed allowing greater freedom for schools to submit students for examinations when they are ready to undertake them then this would have to be recognised in the banding process.

*“Those who are able should be allowed to take qualifications early but those who are not able to do so should be allowed, without stigma, to take them later. The current structures assume that everyone will arrive at the finishing post at the same time – they do not.”*  
**Chair, ASE Cymru (Association for Science Education Wales)**

## **2.21 Partnerships to develop and deliver qualifications**

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There was majority support for the greater involvement of employers in designing and testing the value of qualifications, particularly vocational ones. Just over a third (36%) of respondents thought that employers should play a key role in the development of qualifications for 16 to 19-year-olds while an additional 59% considered that they should at least be involved to some extent. There was less support for employer involvement at 14-16, linking to views that this stage should be more focused on general education.

Additional qualitative evidence outlined that developing links with employers does not apply only to vocational education but also to academic qualifications. This broader engagement would therefore also ensure that employers could have a better understanding of the wider education system and the qualifications that underpin it.

There was also some support for Sector Skills Councils having a key role to play in the development of qualifications including identifying which qualifications should be offered in their sectors, helping to consult with employers and providing a broad overview of the needs of employers. Just over two-fifths (41%) of respondents considered that Sector Skills Councils be the main mechanism for this while 26% were against this proposition. There were also suggestions for pan-sector organisations (SSOs) to have a key role in the development of qualifications to offer a broad perspective reflecting requirements in areas which are common in all sectors, e.g. administration, customer service and management.

There was also qualified support from a range of respondents regarding to what extent universities should play a greater role in the development of A levels. Just over a quarter (28%)

thought they should be involved to a great extent and 67% to some extent. Perceived benefits of this approach included easing transition between KS3 and HE level 4 qualifications and contribution to HE staff development. Some HEIs noted that there were resource implications for HEIs contributing to post-16 qualifications and curriculum development. Others pointed to the need to ensure buy-in across HE sector to ensure equality of opportunities and widening access.

It was noted that the Learning and Skills (Wales) Measure 2009 already provides a legislative framework for all learning organisations delivering to 14-19 years to work collaboratively with each other to construct and support individual learning pathways for young people. There were, however, some calls for more effective collaborative working between curriculum managers and examinations officers across schools, colleges and WBL providers to forge stronger partnership links and common processes and particularly to ensure progression to the next level rather than duplication at the same level.

It was noted by a range of respondents, however, that current funding systems can provide a barrier for genuine collaboration between providers. Several highlighted that the current model incentivises institutions to keep learners internally and this needs to be changed so that the incentive is to move learners on to other provision if it is the best place for them to learn and progress. It was agreed that learner interest should be primary, but that loose collaborative arrangements and the current funding systems currently can be against this notion.

## **2.22 Careers Advice**

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The majority of respondents considered that learners need to be much better supported, informed and advised when choosing qualifications at 14 and 16. It was noted by a wide range of respondents that currently young people are generally advised by teachers and other career organisations and this approach can lack effectiveness and relevance for learners. There were thus calls for more consideration in using students, apprentices and other young people who can have better empathy with school age learners.

There were also calls for high quality, easy to understand information to enable learners to make well informed choices. It was outlined that these should be closely linked to viable



academic and vocational options, providing a balance between the needs and aspirations of learners and the reality of opportunities in Wales. There was also some support for reform and strengthening the Careers Service in Wales and ensure that schools have a structured careers education programme that is integrated into the curriculum and not just part of PSHE.

## **2.23 Destinations Data**

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Providing better, more targeted advice was linked to information about outcomes and progression. There were a range of suggestions as to how current processes could be improved as many respondents noted the urgent requirement for better and more robust and timely data on destinations. These suggestions included better and more consistently using schools and regional consortia to analyse the value qualifications provide, including analysis of the local labour market and learner destinations. There was also some support expressed for gathering this information from awarding bodies, via the extended use of ULNs.

Some difficulties were noted however. Several respondents queried the supposed direct link between general qualifications and ultimate employment outcomes and pointed out that additional factors such as work experience will influence outcomes and progression. Another considered employing a costly system to track learners would be to ignore the evolving “job market” and the ever changing interests and careers of learners. Nevertheless, the majority considered the Welsh Government should take a lead and develop a mechanism for the collection, analysis and reporting of data to assist in and developing more effective learning pathways and the qualifications to support them.

## **2.24 Level 2 Inclusive and Average capped points**

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A majority (60%) of respondents agreed with the proposal to reaffirm the importance of the Level 2 Inclusive and Average capped points score at Key Stage 4 with only 7% disagreeing and 33% not sure. The proposal reaffirming the importance of the Inclusive and Average points score was supported, with only 7% against. The responses to the questions on changes to the measure were less emphatic, with an almost equal three-way split in response to whether there should be changes. On the issue of whether Wales should maintain the ability to make direct

comparisons of school performance with England, 48% supported this, but 44% responded “to some extent” or “not very important”.

## 2.25 Credit-based qualifications

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There was strong qualitative support for elements that are not linked to qualifications or formally assessed units within a coherent programme of learning. Respondents outlined a number of benefits to learners of 14-19 credit based qualifications including enabling learners to progress and build up a qualification flexibly, according to their needs and capacity. It was considered that they are of particular value for certain learners e.g. work-based learners, those in special schools and adult returners and provide recognition of lifelong learning and skills development.

It was noted that the introduction of credit based qualifications and the QCF itself have made it possible to use credit transfer and allow, more widely, the introduction of standardised and coherent qualifications. It was therefore considered essential that they remain within the 14-19 curriculum in order to support the engagement and motivation of all learners.

However there were concerns that centres and employers find them difficult to understand, as they only ‘deal’ in whole qualifications. Several respondents also outlined issues regarding transferability and demonstrating value. It was also highlighted that as long as inspection and performance measures only look at qualification completions and achievements (grades) their flexibility and potential will not fully be realised.

*“We believe that learners need better education around pathways and combinations (role of the education/training provider). For example how credits and units relate to build a full qualification so that learners know they are taking valuable credits along a recognised pathway and with a final purpose. Currently there are too many learners moving from subject to subject, building credit but with little transferability or purpose.”*

### **Skills Wales**

Just over half (55%) of respondents supported the view that there was a role for the delivery and funding of QALL units within programmes of learning for 16-19 year olds with 10% against this proposal. Supporting qualitative evidence stated that these provide bite-size tasters and

potentially fill gaps in learning for some and that they also have the potential to remove barriers to progression and be more relevant to local needs. The programmes could also be centred around one vocational area e.g. Health and Social Care and it was outlined that it may be appropriate to broaden the experience and skills of that learner with QALL units - First Aid and Sign Language were offered as examples.

## 2.26 Creating a new Level 1 qualification

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There was broad qualitative support for 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. It was outlined that rewarding learners who fail to achieve level 2 with a level 1 qualification is fair and reasonable and the creation of a new Level 1 qualification would act as a motivator for the less able to get on the first rung of the lifelong learning ladder. It was also considered essential that the qualification would have to be valued in its own right for those learners who would not be able to achieve at level 2.

Supporting qualitative evidence pointed to the additional need for progression routes to a Level 2 qualification post-16. Respondents noted that lack of level 2 qualifications can be a barrier to A level and HE and therefore some learners should be supported to achieve level 2 when 'exam-ready' in order to access further learning at their own pace. However, several respondents pointed out that Grades D-G mean that Level 1 grading is not necessary and that creating this new qualification may lower the aspirations of some learners and teachers and result in some learners not realising their full potential.

*"It places pupils in set groups and limits achievements. In History GCSE for example currently there are no tiers and some pupils outperform in examinations. Pupils disengage with a course as soon as they know there is a ceiling."* **Teacher**

## 2.27 Relationship between qualifications, literacy and numeracy

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*“At present qualifications in Wales do not give employers sufficient confidence in the skills of young people, particularly literacy, numeracy and employability skills.”* **Federation of Small Businesses**

There was a wide range of opinions expressed regarding the development and promotion of literacy and numeracy skills and how to support them through qualifications. Over half (57%) considered that current suite of qualifications at 14–19 encouraged the development of literacy and numeracy to some extent while 25% considered not very much. There was a less positive response regarding to what extent the current suite of qualifications at 14–19 provides clear information about an individual’s literacy and numeracy with 40% considering to this was the case to some extent while 39% indicating the opposite.

Parents were more positive than other respondents on this point with 61% agreeing to some extent or very much that the suite of qualifications provides clear information on literacy and numeracy while schools and employers were slightly more negative than the rest of the respondents.

*“In the main qualifications are designed to test subject knowledge/competence, learning and the application of knowledge not literacy and numeracy.”* **FE College**

Overall, there were concerns expressed that the GCSEs in Maths and English language currently do not accurately reflect the level of a learner’s literacy or numeracy. Qualitative evidence from respondents considered that literacy and numeracy at 14-16 have been too closely aligned to the subject courses in English and Maths. This has fostered a culture whereby teachers of other subjects have been able to assume that literacy and numeracy is not their responsibility. It was also highlighted that for teachers of English and Maths there has been a clash between developing subject specific skills and more general literacy and numeracy skills.

*“There are issues with both GCSE Maths/English and Essential Skills Wales qualifications. The former are too often taught to test and the latter taught to portfolio –*

*resulting in many learners who have the qualifications at level 2 demonstrating literacy and/or numeracy skills significantly below these levels. This suggests that assessment regimes and/or syllabus content require review and revision. The bolt on nature of Essential Skills is also problematic and discourages effective embedding of literacy and numeracy and devalues the potential worth of the vocational qualification.”* **FE College**

The importance of literacy and numeracy for learners 14-19 was not in dispute however. A number of employers and learning providers considered that Level 2 literacy and numeracy are the minimum requirement for learners to function effectively in their everyday lives and employment. It was outlined that levels below this impact negatively on the ability of learners to develop skills and knowledge and gain other qualifications which are not directly related to literacy or numeracy but require these skills in these to support subject specific learning.

There was also some agreement that a balance of emphasis is needed to promote literacy and numeracy through motivating learner practice and that this integration of literacy and numeracy skills should start before 14 years of age. Recommendations to deliver this included further supporting these skills in academic and vocational contexts which are relevant, meaningful and enjoyable and can encourage confidence and achievement. There was thus strong support for development of National Literacy and Numeracy Frameworks as a basis for building a qualifications structure which specifically recognises achievement in literacy and numeracy.

*‘It is vitally important that lower level learners in literacy and numeracy are given the support and funded appropriately. It seems an imbalance to expect vocational providers to get learners to achieve literacy and numeracy levels in one year where schools have not achieved this in 5 years.’* **First4Skills**

Employers also outlined that they would therefore support a position where the standard of numeracy and literacy was a stronger factor in assessment and the award of qualifications even where this is not the primary purpose of the qualification. This view was further reflected in the strong, cross-sectoral support therefore for the continued opportunity to resit GCSEs Maths and English in order to support post-16 learners in achieving Level 2. Over 95% of all respondents agreed that these learners should be supported to reach this standard in order to improve their confidence, employability and opportunities for progression.

There was a range of suggestions as to how literacy and numeracy could be further integrated into the curriculum and assessed through qualifications. There was some support for other subjects also being chosen to support numeracy and literacy and a pan-curriculum approach to developing these skills while others viewed them as life and employment skills to be developed within their own framework and suite of teaching and learning. This, it was considered, can allow learners to have a sharper focus, a clearer target and would not penalise other subject credits.

The preferred option regarding the Welsh Government suggestions detailed in the consultation document was the commissioning new specifications for GCSE English Language, GCSE Welsh First Language and GCSE Mathematics qualifications for Wales. It was considered that these would have the potential to 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.

There was also some support for options of commissioning new, externally assessed, national literacy and numeracy tests for Key Stage 4 and introducing teacher-assessed literacy and numeracy tests at 16. There was also support for the inclusion of a requirement to reach agreed standards in literacy and numeracy in order to attain accreditation in the Welsh Baccalaureate. Other proposals included a GCSE in numeracy for all learners alongside one in mathematics for 70% of learners alongside views that the GCSE could be changed to be more appropriate for numeracy skills and a suggestion that applied skills and learning should be included in every QCF qualification.

Some respondents also linked improving numeracy to Review proposals to place more emphasis on STEM subjects in the 14-19 phase. A majority (62%) supported these proposals (with 13% against) and there were calls to link support for qualifications in this field to wider economic strategies such as the current focus on the nine priority sectors for Wales outlined in the Welsh Government's Economic Renewal: A New Direction (2010). There were also a number of (unprompted) qualitative comments supporting more focus on Modern Foreign Languages and this was linked to both support for literacy and Wales' international competitiveness.

## 2.28 Divergence

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Inevitably there were a range of strong opinions regarding the potential for Wales to develop its own distinct qualifications system and the opportunities and threats presented by future divergence from the English system. The majority of respondents were positive about the case for Wales developing its own 14-19 qualifications and supporting systems in order to better meet its skills needs. Almost half of respondents (47%) indicated that Wales should do this to some extent, while almost 10% outlined that this was very much the way forward for the Welsh Government.

This support for at least some divergence from England was supported by qualitative comments calling for a greater focus on a unique Welsh vision for education which encompasses the culture, history, language and commitment to non-selective education as well as meeting the skills and learning needs of Welsh economy. It was considered that this process should be undertaken with the aim of being beneficial to for the skills and learning needs of young people in Wales, minimising disruption while guaranteeing same access to progression pathways and still retaining the rigour, validity and equivalence of the qualification itself across the UK.

*“In the longer term the FSB sees no reason why divergence with England in the qualification system should be precluded. This is particularly pertinent as England embarks on a process of de facto divergence from the rest of the UK.”* **Federation of Small Businesses**

*“We recognise the distinct educational policies that have developed and instigated in Wales. Further divergence will provide additional opportunities. Whatever is developed must carry the same ‘weight’ as qualifications elsewhere.”* **Governors Wales**

*“The case for developing qualifications specifically for Wales, both general and vocational, is likely to be strongest and earliest in relation to the 14-16 age range. Wales will need to develop its own basis for maintaining the standards of its 14-16 qualifications.”* **WJEC**

However, just under a third (31%) considered that Wales should not diverge 'very much' from England and 12%, 'not at all. Those not in favour of divergence noted the close links with English HE systems and employers, especially in border regions of Wales and the need for continued comparability and progression opportunities for Welsh learners. There were also concerns expressed that Welsh qualifications may be seen as second rate in comparison to England limiting learning opportunities should some awarding bodies consider Wales-only qualifications not be commercially viable option.

*We suggest that if there is too much divergence, that it will cause confusion amongst employers, particularly those who operate cross border. This is especially the case should GCSEs be different, and as such it would be important to keep these the same.*

### **Employer**

In a further breakdown of results Local Authorities (14-19 Networks and Education departments) were there most supportive of divergence while schools and teachers and employers had views in line with the average. Parents and awarding bodies were more against the proposals although there was a range of views amongst both groups.

There was cross-sectoral agreement that it is imperative that Welsh students are not disadvantaged and that, if divergence is to happen, the requirement for robust development, benchmarking and promotion of any new Wales-only qualifications will be paramount. Supporting qualitative evidence outlined that this would require any future divergence strategy clarifying the meaning of the different qualification levels with the existing and proposed frameworks and placing great emphasis on the credibility of the Welsh qualification system through collaboration with a range of partners.

There was strong qualitative support for the Welsh Baccalaureate Qualification offering great potential to be developed as a longer-term, overarching qualification for Wales to address all these requirements outlined above. Supporters outlined that a qualification emphasising academic, vocational, work-related and social and soft skills as well as literacy and numeracy would enhance the employability of young people and be an important quality and recognised qualification for employers and HEIs. It was widely recognised that this would require significant



development and strengthening of the current qualification in Wales however it was highlighted as a real opportunity for the Welsh Government to lead on.

*“The qualifications system does need to be simpler and more coherent with a common understanding of the meaning of terms such as credits, points, units, guided learning hours etc. The adoption of the overarching qualification through the WBQ would be a logical solution giving the opportunity for learners to develop generic skills and therefore not taught solely for tests.”* **Conwy County Council**

To support any divergent system there was also some suggestions regarding the potential to follow the Scottish example of unifying the various agencies into a single body to assist in the communication and coordination which is essential if the qualifications system is to be fit for purpose. This could involve rebranding Welsh qualifications within a single qualification framework with clearer signposting for users on how qualifications fit within the structure, and what qualifications they need for progression. The potential for therefore unifying the WJEC, Estyn, and the Curriculum Planning (currently within DfES following the abolition of ACCAC) into a single agency was therefore one suggestion to deliver this.

## **2.29 Marketplace and regulation of qualifications**

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This section on awarding organisation arrangements and their implications could be seen as highly topical, given the statements made in England about the alleged impact of the awarding body marketplace on GCSE standards. The responses to the consultation questions were not clear cut, although there was also lack of a strong endorsement of the current arrangements. Relatively few respondents (15%) selected the extreme positions that the current market structure was either very fit for purpose or not at all fit for purpose, whereas 80% felt it to be fit for purpose to some extent or not very much.

The vast majority of respondents (84%) thought learner choice is influenced to a great, or to some, extent by the marketplace and nearly 60% thought that it also impacted on grades, standards or outcomes to a great, or to some, extent. It should be borne in mind that these responses were made before the recent GCSE grading or replacement controversies arose. The opinion on the impact of the marketplace on provision of Welsh language qualifications was

diverse; the balance of opinion was that there was an impact, but a third of respondents to this question chose “no opinion”. Finally, on the issue of whether awarding organisations should be allowed to deliver seminars to teachers in Wales, this attracted overwhelming support, with only 4.7% opposed.

*“Teachers don’t refer to these as ‘seminars’ but as ‘inset’ or ‘professional training’, which reflects their attitude towards these events, and the value that they place on them. Teachers consistently tell us that the training provided by awarding bodies (WJEC mostly) is the most valuable training they receive.” UCAC (translation)*

## **2.30 Benchmarking and promoting Welsh qualifications**

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If qualifications in Wales were to diverge there was almost unanimous cross-sectoral agreement from respondents that significant development and strengthening of the current qualifications system would be required in order to boost its wider credibility and quality assurance. The vast majority also outlined that there will be a requirement for robust development, benchmarking and promotion of any new Wales-only qualifications. This will be essential to ensure credibility and recognition and give young people in Wales a competitive advantage and should therefore be supported by a major communication campaign.

The vast majority (95%) supported the option that the Welsh Government should launch this campaign in relation to qualifications in Wales, once its new policy is established. Supporting qualitative evidence stated that any Welsh Government publicity campaign should focus on the value and relevance of Welsh qualifications, their fitness for purpose, links to existing qualifications and with changes clearly identified and articulated. There should also be recognition of the importance of both academic and vocational qualifications to the Welsh economy, an explanation of the options and choices for learners and a focus on comparability with other well-understood qualifications.

It was noted by respondents that presenting new and unfamiliar qualifications within Wales will be a challenge, and beyond Wales a much larger and potentially expensive one. It will therefore be important to allocate realistic resources and timeframes to achieve any changes and communication to promote new qualifications outside Wales. Illustrating the clarity and

relevance of the proposed qualification structures will be essential and it was recommended to working with partners and other stakeholders at local, national and wider UK and international levels to ensue this.