

Cyflwynwyd yr ymateb hwn i ymchwiliad y [Pwyllgor Plant, Pobl Ifanc ac Addysg i egwyddorion cyffredinol y \[Bil Addysg Drydyddol ac Ymchwil \\(Cymru\\)\]\(#\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) inquiry into the general principles of the [Tertiary Education and Research \(Wales\) Bill](#)

TER 09

Ymateb gan: Cyngor Sir Ceredigion

Response from: Ceredigion County Council

This is Ceredigion County Council's response to this consultation and we are grateful for the opportunity to respond. Our response outlines our response to the general principles and the individual parts of the bill, as can be found below:

- Part 1: Strategic framework for tertiary education and research

We are in general agreement of the ideas and purpose of the Commission for Tertiary Education and Research. Section 3.43 states:

"The Commission will be a Welsh Government sponsored body, operating at arms-length from government but within a strategic planning and funding framework established by the Welsh Ministers. This framework will reflect the Welsh Government Sponsored Body standard framework document."

We feel that it is important to have a national focus to ensure a degree of consistency. As will be eluded throughout this response, there needs to be a consideration of the differences of processes required between rural and urban areas.

In section 3.45 we see the 9 strategic duties of the bill. We are in agreement with these duties, although there will need to be work done to ensure an understanding of society that the wording "Tertiary" is inclusive of schools post-16 provision and not only a consideration of further education establishments. Given the thematic review on Post-16 partnerships, it is pertinent that Promoting Collaboration and coherence is one of the strategic duties. This is one aspect where we feel that there needs to be a consideration of the differing requirements of rural and urban areas. There should be a consideration of the part that virtual teaching has to be play, especially e-sgol. In addition, there should be a focus on Welsh Government's goal to be Carbon Neutral net zero by 2050. Some models at school level, can make

extensive use of moving pupils around locations, which can impact the above goal. In addition, we should consider that the model of moving of pupils around locations, is not always an effective use of funding provided to Local Authorities, and thus schools.

Again in 3.45, we feel that a sustainable and innovative economy should play an intrinsic part of the work of CTER, and should have close alignment with the Regional and Skills Partnership. There needs to be a local feel around this, to ensure that the curriculum provided in local authorities can develop pupils who are work ready for the local areas. This is especially the case in rural areas, where there is narrower range of potential employers. A framework to facilitate this would be beneficial to allow the flexibility noted above. Finally, the strategic aim of "Promoting Welsh Medium Opportunities" should be stronger and should aim for parity for Welsh and English medium offers. We will discuss this in further detail below.

A strength of this commission will be a consideration of all aspects of post-16 by one organisation. One current bottleneck for individuals who are older than 19, to access qualifications is locations who are willing to take external candidates and this should be a consideration of this commission of how to make this process as smooth as possible. However, an extra factor to consider is in rural areas, there is often not provision in further education for people to sit qualifications and there should be a process for how people could sit qualifications in schools and what checks should be conducted, such as a DBS.

3.52 states that

"The duty to encourage participation in tertiary education is an expansion of the duty in the Draft Bill to encourage participation in further education or training and extends its reach to incorporate all aspects of tertiary education. It will now be a core part of the Commission's overall aims."

Our feeling is that the commission should strive for balanced advice and guidance and then inform people to make the best decisions for them. Potentially, encouraging people to take part in tertiary education could put them on the incorrect path for them.

When considering the Welsh Language, aim 4 stated:

"To develop post-compulsory education provision which increases rates of progression and supports everyone, whatever their command of the language, to develop Welsh language skills for use socially and in the workplace."

We wholeheartedly agree with this aim, and feel collaboration with higher education institutions to ensure that there are viable Welsh language options within their progression is key.

In addition the second bullet point of 3.57 states that "take all reasonable steps to ensure that there is sufficient tertiary education provided in Wales through the medium of Welsh to meet reasonable demand".

It is our feeling that this statement does not go far enough. The aim should be for parity of offer between Welsh and English language options, ensuring that the commissions adheres to laws which states this should be the case. The idea of registering institutions who offer Welsh Medium provision, and this would be a positive step when considering the advice and guidance for learners. 3.58 follows a similar theme and a potential avenue within schools, to increase Welsh medium provision, could be to align with the school categorisation process, ensuring that Welsh medium schools offer KS5 subjects in Welsh. This work should also be aligned with local authorities' WESP.

Membership of Commission:

When considering the membership of the commission, it is noted that "at least two tertiary education workforce representatives" will form part of the board. Given the various elements of tertiary education, we feel that this should be at least three tertiary education representatives to ensure that schools, further education and higher education staff, are represented. In addition, the membership of the Board should be sought from across Wales to ensure a representation of the issues facing urban and rural areas, with a representation of consortia and local authority staff. The membership should have a geographical balance of its members. In summary, the board needs to be representative of the individuals that CTER will be servicing.

- Part 2: Registration and regulation of tertiary education providers

The registration process is a sound idea, however, it is important to ensure that it doesn't become a large onerous task, to allow providers to concentrate on being learner focussed. 3.119 states that

"Registration categories will lead to different levels of financial eligibility and there will be scope for variations in regulatory requirements for different types of providers. The Welsh Ministers will be required to determine these categories of registration, and may also specify the categories of registration which will be eligible for respective forms of funding from the Commission."

More information is required on this and a consideration should be on the impact of such a model. We would need to greater information on this, before we could outline

agreement or otherwise with this process. We also feel that more information is required from 3.152 and that removal of providers from registers, should be conducted in close collaboration with local authorities. Another area where this should be the case is in 3.143 and 3.188. Throughout the document there need to be greater explanation of how CTER will work with other organisations. In our case, we would need further information on how Local Authorities fit into the plans of CTER and we would be keen to ensure that this is a positive working relationship to support schools in the most effective way.

Part 3 - Securing and Funding Tertiary Education and Research

When considering funding, a specific focus of the funding model should identify how the formula for Sparsity, Welsh Language and Deprivation, has a role to play in ensuring that the provision is equitable across Wales. It must be a goal of the Commission that there is not a post code lottery for courses and provision and we should not see vastly different offers, dependent on capacity, across different parts of Wales. Flexibility is the key here and there isn't a one model that can be applied as a blanket across the whole country.

3.262 states that "'Eligible' adults are those who are over the age of 19 years old and meet the criteria set out in regulations the Welsh Ministers may make." we need more information on this point, and especially on the impact of having pupils who are post-19 in tertiary organisations.

In 3.363 it notes that learners in sixth forms should take greater responsibility for their learning and that there is want to reduce the complaints from parents. We don't agree with this, and feel we should encourage parental support, as opposed to try and diminish it. In addition, we feel that there should be a mechanism developed for those learners who do not have sufficient parental support and have a type of buddy scheme to ensure that these learners can use education to further themselves.

We welcome what is noted in 3.276 and 3.777 around the facilities required for learners with additional learning needs and the securing of funding on an individual level for learners. We feel that this should go further and should align with the ALN transformation to provide courses which allow progression for pupils from 16-25 years of age and onwards.

3.280 notes that:

"In light of the Commission taking on the strategic responsibility for securing proper facilities for the education and training of 16 to 19 year olds, the Commission is to be enabled, in certain circumstances, to direct that a local authority, or the governing

board of a foundation or voluntary school, establish or discontinue a school sixth form, or make proposals in accordance with such a direction.”

We would need to have further information about how this will work practically. We would require a process where we, as a local authority, were part of the decision from the beginning. We would seek a proactive approach to avoid the need to do this and coordinate sustainable provision. In addition, we feel there should be opportunities for Local Authorities/Consortia to raise concerns with CTER and that this dialogue should happen in both directions. To this end, we welcome 3.282 and look forward to the consultation process for this.

We support 3.285 wholeheartedly which states “For example the Commission could elect to fund work experience for post-16 learners and could work in partnership with other bodies to ensure the provision of information, advice and guidance about learning opportunities and progression routes to employment.” In addition to this, a national register for locations of work experience would be hugely beneficial to educational providers and learners. An ability to work remotely for elements of the work experience would be forward thinking and could benefit learners and providers from all over Wales.

3.296-3.299 focuses on research and innovation. A potential consideration here could be around providing secondment opportunities for practitioners at Schools and FE organisations. This happens successfully in education models in countries across the World and would have a positive impact on lessons by refreshing the industry knowledge that these practitioners would have.

We feel that 3.303 is a hugely important factor to consider, and links to what we noted about funding above. It notes “For example, they may wish to ‘ring fence’ funding to support courses leading to professions where there is a shortage of individuals being able to undertake their role through the medium of Welsh such as in the care or education sectors.” Again, there should be flexibility for this, but it should also be strategically planned to ensure long-term sustainability of these subjects. In the next point, it notes “For example, the Commission could provide funding for Welsh-medium premiums to offset the costs of providing learning activities through the medium of Welsh.” and we feel that the successful e-sgol programme should be a consideration here.

- Part 4: Apprenticeships

In this section, we agree with 3.321 “The Welsh Government intends to develop an apprenticeship system for Wales that is responsive to the needs of learners, the economy and employers.” and feel that this will be beneficial learners hugely. We

appreciate the limitations of this commission is to the post-16 sector, but we feel that this system should align with Welsh Government's 14-16 apprenticeship programme to ensure that there is a pathway through our education system. In addition to this, from 3.327 we feel a consideration of apprenticeships model in a rural setting is important and whether there can be flexibility of the ability for larger employers to provide apprenticeships in rural areas, even though they could be located elsewhere. 3.333 notes that "To be a Welsh apprenticeship the work element of the apprenticeship must take place wholly or mainly in Wales.". We feel that there should be an extra consideration here, that apprenticeships should happen through the medium of Welsh. We do feel, however, there should be the opportunity to do parts of the apprenticeship outside Wales to provide as rich as opportunity as possible.

- Part 5: Learner protection, complaints procedures and learner engagement

While 3.350 talks about learner protection plans and we feel that these are essential to make the commission learner focussed. But, feel that the information considered in this consultation doesn't go far enough in ensuring that this organisation will have the learners as the main focus of their work.

In 3.352 we feel we would need greater information around what is meant by "Discretion" before we can provide a full response. In the next point, it notes "The Commission will not provide notice to a local authority to submit a learner protection plan in relation to school sixth form provision. ". We feel, to ensure consistency across the tertiary providers, local authorities should be required to complete this.

- Part 6: Information, advice and guidance

We welcome 3.383. Currently, we have to wait several years to receive this data and gaining access to this data would allow tertiary providers to strategically plan their curriculum and support.

- Part 7: Miscellaneous and general

No further comment to be made here.