



Christine Chapman AM  
Chair, Children and Young People Committee  
National Assembly for Wales  
Cardiff

11 January 2013

Dear Christine

**14-19 Qualifications Review and “Qualifications Wales”**

We followed with interest your Committee’s discussion of the 14-19 Qualifications Review with Huw Evans and Kate Crabtree on Wednesday, which was particularly timely as the Minister had issued a statement the previous day in relation to “Qualifications Wales”.

WJEC’s brief initial response to the overall 14-19 report was issued on 28 November, and is included as an annexe to this letter. We welcomed the overall recommendations, but on the report’s proposals on matters such as regulation and organisational structures we indicated that these “merit further evaluation and detailed discussion”, and suggested that “these must not distract from the urgent need to develop 14-19 qualifications and learning programmes which fully meet the needs of young people in Wales”.

Whilst we agree with Huw Evans that Wales can indeed build “world class” arrangements for 14-19 qualifications, we have several real concerns that the overall vision and strategy is not being helped by the sequence in which matters are currently being addressed by the Welsh Government. Given the scrutiny role of the Children and Young People Committee, we thought that it might be helpful if we shared with you the following perspective on this week’s developments:

- i. we fully agree with the Minister’s statement that regulation needs to be “strengthened and separated from Government” (first stated on 5<sup>th</sup> Dec and reaffirmed in 8<sup>th</sup> Jan statement)
- ii. the need to strengthen regulation in Wales is urgent in order to deal with the major development agenda that’s being set out for 14-19 qualifications
- iii. the independence of the regulator for Wales, from government and from awarding organisations, will (amongst other things) ensure that it is better placed to engage with the other nations on the current and evolving provision of qualifications that come within the GCSE and GCE frameworks, including work relating to comparability of standards

- iv. Huw Evans is therefore absolutely right in his suggestion, as conveyed to the Children and Young People's Committee (9<sup>th</sup> Jan) that the "Qualifications Wales" organisation needs to be established in the first instance as a regulatory body, reflecting the wording of recommendation 5 of the 14-19 Qualifications Review
- v. in order to do this, the urgent priority is to achieve clarity on (a) what policy role will be retained by Welsh Government in relation to curriculum, skills and qualifications frameworks for Wales, and (b) what regulatory functions does government want "Qualifications Wales" to undertake on its behalf, in relation to general qualifications and vocational qualifications; it then becomes possible to define the kind of arm's length relationship which "Qualifications Wales" as regulator should have with Welsh Government; any due diligence exercise (for which a specification has already been issued by Welsh Government) in relation to "Qualifications Wales" is potentially meaningless unless (a) and (b) have been clearly defined
- vi. in the interests of learners in Wales, the strengthened regulatory arrangements should be in place as early as possible; this is because a considerable proportion of the 14-19 qualifications development work will need to be instigated in 2013, for completion and accreditation in 2014 so that the resulting programmes of learning can be delivered by schools and colleges from September 2015
- vii. our understanding is that the technical/legal aspects associated with establishing "Qualifications Wales" as a regulator in the first instance are considerably more straightforward than the very different set of issues that would need to be addressed in order that it should also be an awarding organisation; hence it would not be unreasonable to aim for a twelve-month timeline to set up "Qualifications Wales" as a strong regulator that's independent of government and of awarding organisations; this would allow "Qualifications Wales" to be the organisation which accredits several new qualifications which will need to reach that stage in 2014 if they are to be delivered in 2015 as recommended by the 14-19 Qualifications Review; we believe that the alternative is unacceptable to stakeholders, i.e. that current regulatory arrangements (not strengthened and not separated from Government) continue to oversee a major part of the intended 14-19 qualifications reform programme
- viii. the new regulatory model for Wales needs to be carefully defined to be fit for purpose in the systems context within which it is to work: key features of that systems context include whether the regulator (a) will be working solely with qualifications frameworks which are Wales-specific, or whether there needs to be engagement with frameworks which are shared with other nations; (b) will be working with one or several awarding organisations; (c) will be regulating Wales-based awarding organisations only, or will also be regulating provision in Wales by awarding organisations that are based outside Wales
- ix. the key features of the systems context can be different for vocational and general qualifications, and this will need to be reflected in the design of the regulatory model
- x. whilst the regulatory model for Scotland is one which is well worth studying in further detail, transference to Wales of what can be learned from it needs to take account of very important differences in the systems contexts of the two countries
- xi. doing anything other than pressing ahead urgently with designing and implementing a strengthened regulatory model for Wales adds huge risk to current arrangements in Wales and prejudices the quality of the excellent set of 14-19 qualifications development proposals that are contained in the Huw Evans report

- xii. unfortunately, the statements and documents that have emerged from Welsh Government this week provide little assurance that addressing the regulatory model is being recognised as an urgent priority in its own right; there is potential to do immense damage by getting this wrong, especially by focusing instead on the different and more complex issues which arise in the context of designing a single organisation that fulfils regulatory and awarding functions; such a model, at best, can't be in place until late 2015, and even then it might not be the optimal model for Wales' systems context; we consider the strategic implementation of the vision for 14-19 qualifications set out in the Huw Evans report to be currently at risk, and this should be a matter of major concern to all learners and stakeholders in Wales.

The above high level perspective is not the right vehicle for us to clarify more detailed specific issues, some of which have been handled with considerable inaccuracy in the public domain this week. We are therefore in the process of compiling a summary of such issues, which we will forward to you once it is completed.

In terms of forthcoming discussions with Welsh Government, WJEC is focussing on the early priorities within the 14-19 qualifications development proposals. These include the proposed qualifications for literacy, numeracy and digital literacy, the proposed evolution of the Welsh Baccalaureate framework and its component parts, and the IVET/CVET proposals. We have no formal meetings scheduled to discuss "Qualifications Wales", but we will do all that we can to encourage urgent consideration of the regulatory model in the context of the imminent qualifications development work.

In closing your Committee's session on Wednesday, you indicated that you would expect to be returning to the 14-19 Qualifications theme over the coming months. Please be assured that WJEC will be very willing contributors to any discussion which you would wish to have, and indeed would be pleased to meet with you and/or the Committee.

Yours sincerely,

**Gareth Pierce**  
Chief Executive

cc Members of Children and Young People Committee  
Minister and Deputy Minister  
other Stakeholders

## **WJEC's response to the publication of 14-19 Qualifications Report**

[20<sup>th</sup> November 2012]

WJEC welcomes the thorough approach taken by Huw Evans and his review board in addressing a range of complex and important educational issues. As the major organisation in Wales tasked with delivering qualifications and providing related support to schools and colleges, we also welcome the report's recognition of the central role WJEC plays at the heart of the nation's education system.

Huw Evans' report makes a number of significant recommendations regarding 14-19 qualifications, which are of vital importance because of their influence on learning programmes for this age group. We must ensure that these programmes and the qualifications to which they lead are of the highest quality and that the public can have full confidence in their integrity and their international comparability.

It is WJEC's priority in Wales to support the Welsh Government in meeting the educational needs of the young people of Wales. We endorse the report's recommendation that qualifications in Wales should diverge from those in other parts of the UK where this is the best way of achieving this aim.

We agree that the Welsh Baccalaureate framework should be developed further, and we are already working on refinements to the qualification with the Welsh Government. We also agree that A levels should be retained in Wales; these are an important part of WJEC's services for learners in Wales, England and Northern Ireland. In addition to supporting new general and vocational qualifications for Wales we are also committed to continuing our current provision of qualifications in England, including GCSEs and any proposed successor qualifications.

The report's proposals on matters such as regulation and organisational structures merit further evaluation and detailed discussion, however these must not distract from the urgent need to develop 14-19 qualifications and learning programmes which fully meet the needs of young people in Wales. We look forward to studying the report's recommendations in detail and contributing to opportunities for debate during the period leading up to policy decisions by the Welsh Government.