
Submission to Children & Young People Committee, National Assembly for Wales

28 January 2013

AQA and its predecessor boards have been providing valued qualifications to Welsh students and working with teachers in Wales for over 50 years, and we are pleased to have this opportunity to provide some comments on the establishment of Qualifications Wales. AQA has a longstanding track record for producing qualifications that are recognised as maintaining high standards. AQA, including CERP (our Centre for Education Research and Policy), is keen to work with the National Assembly for Wales and to provide access to our research evidence on the development and delivery of qualifications and assessments.

While we can understand some of the reasons for setting up Qualifications Wales, we would wish to contribute to the discussion of a number of the risks in doing so.

1. The risks of systemic failure increase with any major reform of the provision of qualifications, particularly as it appears that Qualifications Wales will hold what is likely to become a monopoly position in providing most general or academic qualifications in Wales. If Qualifications Wales becomes in effect both regulator and provider of qualifications, any delivery failure will affect all Welsh students taking end of key stage qualifications.

Paragraph 2.6 of the independent *Review of Qualifications for 14 to 19-year-olds*¹ identifies the need for there to be “appropriate separation of responsibilities within Qualifications Wales between the regulation and awarding of qualifications”, but does not seek to define how these should be separated; nor does it form part of recommendation R5. However, we appreciate that the SQA has successfully managed both of these issues to date.

Recommendation R35 in the report seeks to strengthen the “gatekeeping process for the accreditation and approval of all qualifications for use by 14 to 16-year-olds and 16 to 19-year-olds in Wales”. While we welcome the opportunity to demonstrate that AQA’s qualifications provide relevance, value and progression, we note the conflict of interest that Qualifications Wales will have by its position as regulator and defender of its own market share.

2. Recommendation R6 sets an expectation that by 2015 any provider of general qualifications will be required to provide both English- and Welsh-medium versions of assessments and question papers.

¹ *Review of Qualifications for 14 to 19-year-olds in Wales, Final report and recommendations*, November 2012.

AQA is already the sole provider of GCSE and A-level qualifications that are assessed via the Welsh language: GCE Accounting, GCSE Economics and GCSE Law (via direct entry with WJEC) ². For these subjects, WJEC accepts the entry applications from schools, co-ordinates the marking, awards grades and issues results, based on the qualification and assessments developed by AQA.

We believe that requiring the assessment of all qualifications in Wales to be made available in Welsh as well as English will reduce the breadth of qualifications provided to students in Wales compared with the number provided to their peers in England. We believe this requirement threatens to reduce the range of qualifications offered in Wales because it presents logistical difficulties for providers (unless Qualifications Wales funds this provision) which are likely to prove prohibitively expensive. This raises the risk that Welsh students will be given less choice in the subjects they select, and it may compromise their progression routes to further and higher education.

The issue of choice can be illuminated by comparing provision at A-level. AQA, due to its size, business model and charitable status, is able to offer the following A-levels which WJEC does not currently provide:

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|------------------------|---------------------------|--------------------|
| Accounting | Communication and Culture | Leisure Studies |
| Anthropology | Critical Thinking | Modern Hebrew |
| Applied Art and Design | Dance | Panjabi |
| Archaeology | Environmental Studies | Philosophy |
| Bengali | General Studies | Polish |
| Citizenship Studies | History of Art | Science in Society |
| Classical Civilisation | | |

Recommendation R25 argues for the maintenance in Wales of the same A-levels as in England and Northern Ireland. However, recommendation R6 could prevent the realisation of recommendation R25 if A-levels delivered by English awarding organisations to a comparatively smaller number of candidates have to be delivered in the Welsh medium.

3. We note that the Scottish model of regulation, development and delivery of qualifications will be considered in establishing Qualifications Wales. Where qualifications (including vocational qualifications) offered in Wales continue to be the same as those in England and Northern Ireland, it will be essential that the same standards are applied across all jurisdictions. Even where Qualifications Wales develops qualifications that are *different from* those offered in England and Northern Ireland, clear equivalences will need to be drawn. We believe it is essential that maintaining the integrity of the standard and ‘currency’ of qualifications across jurisdictions is carefully planned and agreed with important stakeholders, including Ofqual and UCAS.

Employers considering Welsh and English students for the same job may well be confused by the different qualifications and the standard of attainment they each represent. Clarity and agreement over equivalences will be needed to avoid confusion which could damage the life chances of young people applying for such jobs or competing for training opportunities. Only with well-established equivalences will it be possible for the National Assembly for Wales to meet fully the requirement of recommendation R3 that “qualifications in Wales are of a standard comparable with the best in the world, so that they offer portability”. Recommendation R4, to “launch a substantial, long-term, UK-wide communication strategy to promote and explain the qualifications available in Wales”, will have

² By agreement through the Joint Council for Qualifications, OCR and Edexcel also offer access to qualifications which are not currently provided by WJEC.

a much greater impact if it builds on the application of common standards for UK-wide qualifications and can demonstrate equivalent standards where expected.

4. We welcome the prospect of A-levels being retained in Wales; however, in England we await greater clarity about the policy review by the Department for Education, which will affect the structure and content of these qualifications. It is essential for students in Wales and England that A-levels represent the same level of achievement, regardless of the UK country in which they are awarded. Not to secure this comparability would severely undermine the credibility of A-levels and the way they are used by higher education and employers.

5. On a more practical note, there is a limited pool of subject experts who are in a position to evaluate the quality of new qualifications, in respect of: their content; the structure of their assessment; and their standard (or level of difficulty). It is likely that, with the creation of Qualifications Wales, intense demand will be placed on this limited pool of experts as qualifications are being first developed and then reviewed for their quality, leading to shortages experienced by regulators and awarding bodies alike. This could hinder the achievement of recommendation R25, which seeks the involvement of higher education institutions in Wales in the development and/or accreditation of A-levels. However, the recommendation does not take into account groups such as the 14,978 Welsh students who chose to study at English universities in 2012, and whether A-levels accredited for delivery in Wales will readily support transition to universities outside of Wales.