
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	14.05.24
Pwnc / Subject:	Consultation on proposed approach to designating 14-16 qualifications consultation

Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

This response is not confidential.

Response

Introduction

Overall, we agree with the proposals for the approach to designating 14-16 qualifications. The proposals take into account a broad range of information and the exemption criteria are clear and sensible.

We agree with the importance of qualifications being available bilingually. It will be important to consider how exemption criteria will be applied where a qualification will not be available bilingually.

We would encourage Qualifications Wales to consider:

- The potential costs for centres in the context of their current budgetary pressures and the implications of schools potentially recruiting new staff with the necessary specialist knowledge of vocational or technical education which may create unnecessary competition with other providers.
- The impact that increasing digital assessment may have on centres and pupils.
- The concerns we have already raised with regards to the integral skills qualification, including skills for life, skills for work and integral skills project.

Consultation questions

1. Our policy objective is that from September 2027, the full range of approved National 14-16 Qualifications will be available and will replace the majority of other publicly funded pre-16 qualifications currently available. We have assessed the impacts of this policy objective as part of our [Qualified for the Future consultation in 2021](#) and as part of our consultation on the [Full 14-16 Qualification Offer in 2023](#).

Are there any further impacts that we have not considered in the implementation of this policy objective?

Yes

2. Please explain your answer.

Although we recognise that Qualifications Wales have carried out a robust impact assessment, we remain concerned about the focus of making 'the most of digital technology'. This is likely to have an impact on schools and pupils, particularly those living in poverty. We would encourage Qualifications Wales to only make use of digital assessment processes where they support the qualification. It will be important that any impact assessment considers the potential costs for centres and their current budgetary pressures and the implications of schools potentially recruiting new

staff with the necessary specialist knowledge of vocational or technical education which may create nugatory competition with other providers.

As these qualifications sit alongside a range of other qualifications, we would encourage Qualifications Wales to consider carefully how the integral skills qualification, including skills for life, skills for work and integral skills project support pupils to make meaningful progress. In our previous consultation we raised concerns about this skills suite. We remain concerned about the meaningfulness of these qualifications and note that there is a risk that centres use these qualifications as a way of demonstrating that they meet requirements of Curriculum for Wales rather than it being a qualification that pupils need.

We believe that it would be more beneficial if integral skills were integrated into other assessments and qualifications.

3. To what extent do you agree or disagree with our proposed exemption criteria that an awarding body will be required to meet if unable to fulfil one or more of our guiding principles?

Qualifications within the new 14-16 offer will need to:

- relate to, and support, the aims and purposes of the new curriculum;
- be available in Cymraeg (Welsh) and English, and
- contribute to a coherent and inclusive range of qualifications that meets the needs of all learners..

Agree

4. Please explain your answer

The exemption criteria seem reasonable and proportionate. It will be important to consider how centres or awarding bodies will be required to provide information to demonstrate that qualifications meet exemption criteria.

5. Are there any additional exemption criteria that we should consider including?

No

6. Please explain your answer.

Although we agree with the exemption criteria, it will be important that Qualifications Wales consider how they will apply these criteria when a qualification will not be offered bilingually.

If relevant, please provide examples of qualifications that you consider to be essential to 14-16 learners which will not form part of the new approved [National 14-16 Qualifications](#) offer and that will not meet our [guiding principles](#). Our proposal is that such qualifications could only be designated as eligible for public funding if they met our proposed exemption criteria.

7. To what extent do you agree or disagree with the proposed matters that we will take into account when determining the extent to which a qualification meets our exemption criteria?

Agree

8. Please explain your answer.

The process seems reasonable and proportionate

9. To what extent do you agree or disagree with the proposed evidence that we will take into account when determining the extent to which a qualification meets our exemption criteria?

Agree

10. Please explain your answer.

11. Are there any additional matters and/or evidence we should take into account when determining whether to apply an exemption or not?

12.

No

13. Please explain your answer.