



**COLEGAUCYMRU POLICY ASKS FOR
THE NEXT WELSH GOVERNMENT**

**THEME 2: A COHERENT AND CONNECTED
SYSTEM THAT INCLUDES FLEXIBLE AND
VALUED QUALIFICATIONS**

March 2021

This briefing expands on Theme 2 of ColegauCymru's *Further Success: Policy Recommendations for the next Welsh Government in Post-16 Education and Lifelong Learning in Wales*. Together with our *Enabling Renewal: Further Education and Building Better Citizenship, Occupations and Business Communities in Wales* report, these documents present a vision and practical action for further education in Wales.¹

Summary

ColegauCymru highlights the need to develop a coherent and connected system of qualifications that are flexible and valued by learners and employers alike.

In line with this, the future Welsh Government should:

- In conjunction with the sector, employers, and key stakeholders, develop a coherent post-16 vision and a system that addresses the issue of unnecessary competition, enables proportionate and effective regulation of qualifications, and works in the best interests of all learners and staff, using a ministerial review or other method as a basis.
- Use existing powers to develop a means to deliver and regulate Level 4 and Level 5 qualifications, whether by establishing a Technical Accreditation Council for Wales or mandating and regulating partnership and cooperation between Further Education and Higher Education Institutions (HEIs) and employers.
- Carry out a review of Qualifications Wales and its responsibilities with a view to making appropriate changes to its legal basis, functions and capacity (that would allow it to host the Technical Accreditation Council if necessary).
- Provide access to student finance for Level 4 and Level 5 programmes alongside the development of flexible, means tested/income based personal learning accounts for adults (post-25).
- Introduce a more flexible system of learning and qualifications that are not based on variations of 35 week/ 1- or 2-year programmes, predominantly delivered in traditional 'school hours'. This includes updated professional training, as well as qualifications which are not tied to one specific level (and could include appropriate elements of Levels 2-4).
- Make it easier for smaller units of learning, rather than full qualifications, to be recognised, portable, and for learners to be able to build these over time, making enhanced use of effective Recognition of Prior Learning (RPL) processes.

¹ John Buchanan et al., *Enabling Renewal: Further Education and Building Better Citizenship, Occupations and Business Communities in Wales*, ColegauCymru, 2021, available at: <https://www.colleges.wales/image/publications/reports/Enabling%20Renewal%20-%20FE/Enabling%20Renewal%20-%20FE.pdf>

Developing a coherent post-16 vision

Post-compulsory education in Wales is at a crossroads amid the impact of COVID-19, Brexit, and broader national and international factors.² As such, the development of a cohesive and coherent post-16 landscape needs to be established in conjunction with employers, stakeholders, and the sector more broadly. Separately, in briefing one, Colegau Cymru addresses how the current statutory basis for education creates an education ‘cliff edge’ at 16 and then at 18 unless learners make a linear journey transitioning between school or college and Higher Education (HE). The delivery of qualifications exacerbates this situation and privileges academic progression above the opportunity to attain higher level vocational competency.

A coherent system

The post-16 education sector in Wales is hindered by insufficient collaboration between institutions. There is a duplication of resources between, and across, sixth forms, further education, and higher education. Ultimately there is an absence of an overall sector vision.³ *The Strategic Vision for PCET* and accompanying *Principles of Change* launched by Welsh Government in late 2020 go some way towards addressing this gap but contain little in terms of implementation detail.⁴ The needs of citizens progressing to higher level vocational study are also conflated with the specific challenges evident in the sustainable provision of higher education in Wales when this should not be the case.

The existing post-16 allocation methodology promotes institutional competition. Currently, sixth form allocations are firstly calculated by multiplying the number of past year learners who attended sixth forms (average return rates) by the average funding per programme, with uplifts for deprivation decile, spatial rurality, and language medium. Subsequently, further education budgets are set within the remainder of the allocation.⁵ The next Welsh Government should review its allocation methodology to ensure best outcomes for the learner and ensure that funding formulas are based on the newly established statutory right to education to age 25 or a Level 3 qualification. A future methodology should be resilient and provide clarity and coherence. It must ensure that post-16 learners are not hindered by institutional bias and are able to access courses that maximise learner potential.

² Professor Ellen Hazelkorn, *Towards 2030: A framework for building a world-class post-compulsory education system for Wales*, (2016), p10.

³ Ibid, p9.

⁴ Welsh Government, *Post-Compulsory Education and Training (PCET) Strategic Vision: Meeting the Education, Training and Research Needs and Aspirations of the People, Businesses and Communities of Wales* (2020), [strategic-vision-post-compulsory-education-and-training.pdf](https://gov.wales/sites/default/files/publications/2020-11/principles-for-change-post-compulsory-education-and-training.pdf) (gov.wales); Welsh Government, *Post-Compulsory Education and Training (PCET), Principles for Change, Supporting the Strategic Vision* (2020), <https://gov.wales/sites/default/files/publications/2020-11/principles-for-change-post-compulsory-education-and-training.pdf>

⁵ Joseph Champion, *Research Briefing: A quick guide to post-16 education funding* (2018), p4, <https://senedd.wales/media/rxmjdfm/18-028-web-english.pdf>

By altering the existing funding methodology and moving towards a methodology whereby individual learner needs are prioritised, there would also be further scope for participation in Welsh medium study. Fluent Welsh speakers that have attended English language schools could be exposed to post-16 courses taught through the medium of Welsh where beneficial and appropriate.

Alongside changing the post-16 funding formula, there should be a coherent approach to partnership working between schools and colleges. Currently, a majority of senior leaders at schools report that their relationship with local colleges is not as strong as their relationship with local schools, and state that this is due to a sense of competition and lack of transparency and trust between the sectors.⁶ The next Welsh Government should review and amend legislation to ensure partnership working across the post-16 sector is to the benefit of learners. The next Welsh Government should also implement the recommendations of the Estyn Thematic Review of Post 16 Partnerships.⁷ The current draft provisions with the proposed Commission for Tertiary Education and Research (CTER) Bill are not sufficiently robust in this respect and a better mechanism for collaboration should be explored. It is the view of Colegau Cymru that the provisions outlined by the 2020 Welsh Government consultation fall short of creating a coherent and connected system of tertiary education, rather that it codifies in new legislation the weaknesses of the current model.

Provision of Work Based Learning (WBL) could also be reformed in order to further reduce the unnecessary competition that results from the tendering process to deliver mainstream provision. WBL contracts should be delivered through an assigned formula which allows colleges to deliver programmes effectively for learners and employers and benefit proportionately according to their profile. Collaboration between independent training providers should be encouraged with FEIs able to provide better assurances to those providers under local procurement undertaken by the college.

Developing a system that works in the best interests of learners and staff

A holistic and transparent strategy should be developed to ensure that FEIs and school sixth forms work collaboratively to broaden the curriculum offer in Wales, and to provide staff with sufficient information to safeguard and teach learners.

Under current legislation, should a learner transfer between schools, the learner's Common Transfer File (CTF) must accompany them. However, if a learner transfers to an FEI, this file is not transferred.⁸ Ultimately, the majority of providers do not share information on individual learners when they transfer to a different institution, and few providers follow Welsh Government guidance on *Effective post-16 transitions and data sharing*.⁹ This lack of collaboration can impact on learners as FEI staff are often unaware of their achievements and wellbeing needs when they switch institutions. The

⁶ Estyn, *Post-16 partnerships: Shared planning and provision between schools, and between schools and colleges*, 2021, <https://www.estyn.gov.wales/system/files/2021-01/Post-16%20partnerships%20en.pdf>, p12.

⁷ Ibid.

⁸ Welsh Government Consultation Document, *Public Good and a Prosperous Wales*, (2018), <https://gov.wales/sites/default/files/consultations/2018-04/180423-tertiary-education-and-research-commission-for-wales-consultation-document.pdf>, p43.

⁹ Estyn, *Post-16 partnerships*, (2021), <https://www.estyn.gov.wales/system/files/2021-01/Post-16%20partnerships%20en.pdf>, p14.

response to the COVID-19 pandemic has heightened concerns in respect of this lack of information as individual learners experience of the curriculum has become interrupted.

Many learners are not given sufficient advice to make informed choices about the full range of post-16 learning opportunities available.¹⁰ Where tertiary models have not been adopted, post-16 learner choices are often restricted by a range of factors including available institution options, and a general focus on pursuing academic routes rather than vocational, irrespective of individual learner needs. Schools with sixth forms often guide and advise learners to remain in their school rather than appropriately providing information on best suited education and career options.¹¹ In essence, access to post-16 learner paths are decided by policy choices made by individual local authorities. Access to information is determined by pre-existing collaboration between schools and other providers, and geographic location. A lack of a coherent strategy between educational institutions often means that learners are not made aware of options which could be beneficial at FEIs such as studying junior apprenticeships at 14-16, taking a vocational pathway, or studying academic subjects at an institution with better course-specific facilities and a greater critical mass of likeminded learners. Ultimately, all learners should be provided with cohesive, impartial advice on their career aspirations. The interests and benefits to the learner should lie at the heart of the post-16 system. This is sometimes in opposition to the current system whereby the benefit to the learner can be jeopardised by an overly competitive system.

Proportionate and effective regulation

FEIs are extremely diverse institutions and facilitate a wide range of learning activities. Whilst providing an array of services, colleges have consistently produced high standards of teaching and learning. They also provide safe spaces for learners with different backgrounds and needs, and make good use of internal resources.¹²

Despite further education's status as a low-risk sector with stable historical high performance, its diversity means that it is subject to a significant number of audits and inspections. These in turn harbour a system of unnecessary bureaucracy and replication in many instances. To elaborate, as FEIs host a range of services, separate quality and assurance inspections are carried out by Estyn on further education services, WBL provision, and Adult Community Learning (ACL) provision. Within all three areas, Estyn inspection guidelines outline use of resources, provision of Welsh language opportunities from providers, provider support services and provider safeguarding practices as key

¹⁰ Estyn, *The Annual Report of Her Majesty's Chief Inspector of Education and Training in Wales 2018-2019*, p52, https://www.estyn.gov.wales/sites/www.estyn.gov.wales/files/2020-07/Annual_Report_2018_2019_en_2.pdf

¹¹ Estyn, *A Levels in Sixth Forms and Further Education Colleges* (November 2018), <https://www.estyn.gov.wales/system/files/2020-07/A%2520levels%2520in%2520sixth%2520forms%2520and%2520further%2520education%2520colleges.pdf>, p8.

¹² Estyn, *The Annual Report of Her Majesty's Chief Inspector of Education and Training in Wales* (2019-2020), https://www.estyn.gov.wales/sites/www.estyn.gov.wales/files/2020-12/ESTYN%20Annual%20Report%202019-2020_full-report.pdf, p82.

inspection areas.¹³ However, in many instances there will be replication of inspections as provider services and learner workspaces are multipurpose and are used across different types of provision. The issue of duplication in inspecting provider services is further highlighted when taking into account the requirements of universities' assurance systems and QAA reviews for providing higher education study in FEIs. This longstanding issue was recognised in 2013 as a feature of unnecessary bureaucracy and remains a barrier to providing the most efficient and effective further education system today.¹⁴ The future Welsh Government should streamline the inspection and audit of some provider services to prevent unnecessary (re)assessment, and rather than attempting to provide a 'one size fits all' approach to quality assurance, it should work to encourage collaboration and the sharing of information between regulatory services.

Delivering and regulating Level 4 or Level 5 qualifications

As outlined by *The Diamond Review*, where appropriate, FEIs should be able to make a distinctive offer to learners and employers in the field of higher technical education through the provision of Level 4 and Level 5 qualifications.¹⁵ As we approach the election, Colegau Cymru is concerned that this important insight has been overlooked within the draft PCET Bill. Ignoring the need to provide complementary routes as envisaged by Sir Ian Diamond will perpetuate, not solve, existing inequalities. A lower proportion of people in Wales attain technical professional qualifications than in other advanced economies.¹⁶ 9.1% of the adult population in Wales currently hold a Level 4 or Level 5 qualification.¹⁷ Comparatively, this figure is over 15% in the USA and Australia, and 20% in Germany.¹⁸ Ultimately, there is a shortage of higher technically qualified professionals in Wales as evidenced by research outlining that sectors such as telecoms and repair and mechanical engineering face skills

¹³ Estyn, *Guidance handbook for the inspection of work based learning, Further Education, and Adult Community Learning* (2019), <https://www.estyn.gov.wales/system/files/2020-07/Guidance%2520handbook%2520for%2520the%2520inspection%2520of%2520community-based%2520adult%2520learning%25202019.pdf>, <https://www.estyn.gov.wales/system/files/2020-07/Guidance%2520handbook%2520for%2520the%2520inspection%2520of%2520WBL%2520providers%2520-%25202019.pdf>, <https://www.estyn.gov.wales/system/files/2020-07/Guidance%2520handbook%2520for%2520the%2520inspection%2520of%2520FE%2520colleges%2520-%25202019.pdf>

¹⁴ Government Social Research, *Review of Post-16 Quality Standard* (2013), <https://gov.wales/sites/default/files/statistics-and-research/2019-07/130916-review-post-16-quality-standard-en.pdf>, p20.

¹⁵ Diamond Review, *Review of Higher Education Funding and Student Finance Arrangements in Wales*, <https://gov.wales/sites/default/files/publications/2018-02/higher-education-funding-final-report-en.pdf> (2016), p11.

¹⁶ Scott Kelly, *Raising productivity by improving higher technical education* (2015), https://www.hepi.ac.uk/wp-content/uploads/2015/07/productivity_final_web.pdf, p7.

¹⁷ EMSI Analyst tool.

¹⁸ Scott Kelly, *Raising Productivity* (2015), https://www.hepi.ac.uk/wp-content/uploads/2015/07/productivity_final_web.pdf, p17.

gaps resulting from incomplete technical qualifications in Wales.¹⁹ This is despite the steps taken to widen access to higher education and specifically to universities over the last twenty years. A key purpose of any policy development in this area would be to introduce a greater range of Level 4 and 5 qualifications and courses to be delivered via FEIs.

FEIs are perfectly placed to facilitate the delivery of these qualifications in line with skill and employer demand due to existing links with industry, appropriate facilities, and high-quality levels of teaching and learning. Additionally, as these qualifications are more cost effective to deliver than Level 6 qualifications, employer and government funding should be incentivised. There should also be options for self-funding for potential learners.

Colegau Cymru has identified two potential ways to both develop and regulate this provision. However, these options are by no means exhaustive and further debate on the topic should be encouraged.

Introducing a Technical Accreditation Council for Wales

A Technical Accreditation Council (TAC) for Wales would provide recognised and reputable accreditation for higher technical qualifications. A TAC would be an independent body that provides quality assurance checks on teaching and learning to ensure that industry and economic demands are met. This model is used in a range of high performing economies such as Germany and Canada. Key benefits of introducing a TAC include instilling confidence into learners and the community that technical qualifications are useful for meeting skill shortages and employer demand, they provide a framework for continually improving the quality, efficiency and diversity of technical programmes and support an affordable reskilling and upskilling system.²⁰

Mandating and regulating partnerships and cooperation between further education and higher education institutions

An alternative approach advocates a more responsive, supportive, and collaborative relationship between universities and FEIs which is not bound by a regulatory approach. Rather, FEIs and universities should work with local employers and the regional economy to offer local high quality learning opportunities. This approach proposes that through collaboration, FEIs and universities have different target learner groups and jointly offer courses in the best interest of the learner.

FEIs should not market themselves as competition to universities. Rather, FEIs and universities should make use of their specific qualities to provide the highest standard of education and best opportunity for the individual learner. For FEIs, this should consist of continuing to provide existing Level 4 through to Level 6 provision to learners in order to make the best use of features such as smaller class

¹⁹ G. Mason, *Employer Data in Employment and Skills: Issues in the UK* (2008), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936388/131120_FINAL_literature_review_for_publication.pdf

²⁰ Association of Colleges, *Breaking the Mould: Establishing a Technical Education Accreditation Council* (2015), p8, <https://www.aoc.co.uk/sites/default/files/Technical%20Education%20Accreditation%20Council.pdf>

sizes, technical expertise, and allowing for study alongside work commitments. Meanwhile, FEIs should not unnecessarily compete with universities by branching too far into areas such as academic research. Rather, FEIs and universities should take a coherent and collaborative approach whereby they share facilities and resources to provide best outcomes for learners in conjunction with local employers. To drive this collaboration, and to avoid unnecessary competition, the further education sector should work jointly with HEFCW and with their existing university partners. Subsequently, Welsh Government should offer protection to the further education sector to ensure collaboration by ringfencing funding specifically for each sector.

This proposition has successfully been piloted through Coleg Cambria's partnerships with Liverpool Moores, Glyndwr, and Bangor universities. In line with local employer demand, Coleg Cambria recently teamed up with Redrow Housing and Liverpool John Moores University to offer the UK's first dedicated housebuilding degree. This course is taught through classroom learning at the respective sites, as well as enabling learners to undertake practical experience, digital learning, and tutorials.²¹ In making this recommendation, Colegau Cymru is mindful of the challenges implicit in mandating cooperation between autonomous institutions.

Review of Qualifications Wales

Qualifications Wales was established in August 2015 and is an independent regulatory body set up to ensure that qualifications are effective for meeting the reasonable needs of learners in Wales and to promote public confidence in qualifications and the Welsh qualification system.²²

There is no legal requirement for Qualifications Wales to be reviewed independently after a set timeframe. Qualifications Wales must produce an annual report detailing how it has exercised its functions.²³ However, this process does not allow for regular independent review to ensure that Qualifications Wales is working in the best interests of the education sector and has the appropriate powers to fulfil its purpose. *The Qualifications Wales Act 2015* provides powers to make 'any supplementary, incidental or consequential provision' and 'any transitional, transitory or saving provision' to Welsh Government.²⁴ A future Welsh Government would be able to make amendments to improve the scrutiny process should they deem this appropriate.

In England, Ofqual employs a 'standards advisory board' made up of independent assessment specialists to review research and make recommendations on maintaining the standards of

²¹ Cambria College, *Redrow Teams Up with Academic Institutions to launch UK's First Dedicated Housebuilding Degree* (2018), <https://www.cambria.ac.uk/redrow-teams-up-with-academic-institutions-to-launch-uks-first-dedicated-housebuilding-degree/>, [Accessed 09/02/2021].

²² Qualifications Wales, *Our Role*, <https://www.qualificationswales.org/english/about-us/introduction/our-role/> [Accessed 26/01/2021]; Qualifications Wales Act 2015. <https://www.legislation.gov.uk/anaw/2015/5/section/3/enacted>.

²³ Qualifications Wales Act 2015, *Annual and other reports*, <https://www.legislation.gov.uk/anaw/2015/5/schedule/1/paragraph/28/enacted>

²⁴ Qualifications Wales Act 2015, 59, <https://www.legislation.gov.uk/anaw/2015/5/section/59/enacted>

qualifications.²⁵ Similarly, the *Scottish Qualifications Authority Act 2002* ensured that an ‘Advisory Council’ was established as a part of the Scottish Qualifications Authority (SQA). This Council provides consistent advice to the SQA and Scottish Ministers and allows for ‘incidental or supplementary provision as Scottish Ministers think fit’.²⁶ It would be beneficial for Qualifications Wales to follow these examples of statutory governance structures, and to be regularly reviewed to help meet the core aims of the body.

As the *Qualifications Wales Act (2015)* provides scope to make ‘supplementary’ and ‘transitional’ provision, there is an option to enable Qualifications Wales to host the Technical Accreditation Council. This would be beneficial for limiting bureaucracy and would help build on already established frameworks within Qualifications Wales. Similar consideration could also be given to ensuring that schools, colleges and other stakeholders have a means by which they can participate in the organisation’s regulation of general and academic qualifications.

Access to student finance for Level 4 and 5 programmes

Building on the notion of FEIs facilitating the provision of Level 4 and Level 5 programmes, these courses need to be accessible and affordable. Learners should be entitled to access student finance but in some circumstances, learners could be encouraged to self-fund if necessary or access funding from their employer.

Currently, there are two routes to attaining qualifications which are eligible for student finance: through an awarding body which is regulated by Qualifications Wales, or through a university.²⁷ FEIs do not have autonomous accreditation powers. Therefore, if an FEI is to deliver Level 4 or Level 5 qualification in line with industry and skill demand, the learner would not be entitled to financial support to access a relevant course and qualification. Alternatively, should an individual’s funding be already exhausted, access to courses should be within reach and not cost prohibitive.

By enabling FEIs to deliver accredited qualifications, courses could become more efficient and affordable. FEIs will not be tied to delivering university-franchised courses. Therefore, the cost of delivering programmes will be lowered as learners will be able to attain qualifications at a Level 4 or Level 5 standard without unnecessarily being obliged to complete a degree. Additionally, by facilitating FEIs to deliver accredited qualifications, the cost basis of programme delivery can be based on existing facilities at the venue where the course is being completed, as opposed to calculations based on facilities at universities which are not being used by learners enrolled on higher education courses delivered at FEIs.

²⁵ Ofqual, *Our Governance*, <https://www.gov.uk/government/organisations/ofqual/about/our-governance>, [Accessed 26/01/2021].

²⁶ Scottish Qualifications Authority Act 2002, *Advisory Council*, <https://www.legislation.gov.uk/asp/2002/14/section/3>.

²⁷ Student Finance Wales, *Who can get student finance*, <https://www.studentfinancewales.co.uk/discover-student-finance>, [Accessed 16/02/2021].

As courses provided by FEIs could be delivered at a lower cost, learners should be able to access student loans for lower amounts than those completing Level 6 qualifications. This therefore provides increased course options for learners. Subsequently, this incentivises studying qualifications where there is industry demand as learners will have access to an established safe financial agreement which, in appropriate circumstances, could encourage self-funding.

This extension of student finance for Level 4 and Level 5 courses should be undertaken alongside further development and extension of the existing system.

Developing a flexible learning system

Throughout COVID-19, flexible and remote work and learning has become much more prevalent. Educational institutions have trialled digital and asynchronous learning options outside of standardised hours and undoubtedly a greater element of this teaching and learning approach will continue.

Colegau Cymru advocates for creating and developing progressive, fluid qualifications which are not limited to studying for set time periods or for a certain number of hours per week. Rather, the creation of flexible courses whereby learners partake in continuous professional development and are taught relevant aspects across different levels would be beneficial to tackle skill shortages in Wales. For example, it could be beneficial to align aspects of Level 2 data administration with Level 4 project management skills to attain an occupation-relevant qualification.

It is imperative that such qualifications would be appropriately regulated and accredited to ensure that their reputability is maintained, and available in both Welsh and English. The next Welsh Government should outline standards and assessment methods required to award such qualifications. Additionally, awarding bodies should work collaboratively to more consistently identify recognition of prior learning (RPL) which can be used in attaining such qualifications.

Smaller, portable units of learning

Smaller units of learning, frequently termed micro-credentials, are sometimes used to upskill employees to meet immediate workforce development needs.²⁸ While meeting workplace demands, it is imperative that these units are relevant and beneficial to both employee and employer. It is also important that they are transferrable and can be used to establish a larger portfolio of accredited qualifications. Significantly, recognition of small units of learning should provide a pathway for those

²⁸ QAA, *Credit where it is due: How can England's credit framework recognise micro-credits?*, <https://www.qaa.ac.uk/news-events/blog/credit-where-it-is-due-how-can-england-s-credit-framework-recognise-micro-credits> [Accessed 04/02/2021].

who cannot fully commit to education to have a chance to study relevant modules. They should enable learners to progress to further study and act as a platform for career advancing opportunities.

Enhanced use of RPL processes

RPL is a process which enables education providers to recognise and value skills, knowledge and past experiences of individuals regardless of where these have been acquired.²⁹ In reflecting on international best practice, Colegau Cymru believes that Wales has made too little use of this important mechanism for demonstrating and defining technical competence. Improved guidance should be made available on the use of RPL across the further education sector and we suggest that this, subject to the proposed review, should be a core function of Qualifications Wales. This will subsequently enable learners to make informed choices about the potential future use of learning they undertake and the scope of their current achievements and technical competence. It will also allow for previous learning or experience to be recognised, rather than being repeated unnecessarily, and encourage transferrable skills to be shared.

²⁹ USW, *Recognition of Prior Learning*, <https://celt.southwales.ac.uk/recognition-prior-learning/> [Accessed 09/02/2021].

This briefing is the second in a series of five covering each of the themes identified in *Further Success: Policy Recommendations for the next Welsh Government in Post-16 Education and Lifelong Learning for Wales*.



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