

**P-06-1540 Remove The Manipulative Funding System Forcing Students To Do Welsh Baccalaureate - Petitioner to Committee, 06 December 2025**

Dear Committee,

Thank you for inviting my comments on the Cabinet Secretary for Education's response to my petition, *"Remove The Manipulative Funding System Forcing Students To Do Welsh Baccalaureate"* (P-06-1540).

I am grateful that the Committee is considering this issue seriously. But, I am deeply concerned that the Cabinet Secretary's letter does NOT accurately reflect what is happening in colleges across Wales. Lynne Neagle MS/AS has failed to engage with the evidence and FOI data I have provided, and in several places is directly contradicted by my college's own statements about funding.

My thoughts on the Cabinet Secretary's document, is that I am disappointed. The letter repeats the Welsh Government's public position, but it does not address the central issue of my petition, which is in practice, the funding model creates a powerful financial incentive for colleges to make Welsh Baccalaureate compulsory, even though it is officially "not compulsory". Myself, and thousands of students across Wales can not drop it due to the funding incentive which the Cabinet Secretary is denying, as she says that there is "no bespoke funding for the ASBW, and schools and colleges are not financially incentivised to promote uptake of this course." This is not consistent with FOI data from Coleg Sir Gâr, which shows a clear funding uplift when students are enrolled on Welsh Bacc/ASBW, alongside AS/A levels. We do not have student choice because of the Welsh Government's funding incentive. Whether the qualification is funded as a separate A-level sized qualification, then enrolling learners on that qualification obviously increases funding compared to the 3 A-levels without it. That is a financial incentive, whether Lynne Neagle MS labels it as "bespoke" or not. We can not drop the subject due to the needed funding the college receives.

In other words, the letter answers a question I didn't ask. I never asked if there was some ring-fenced pot of money only labelled ASBW. However, Lynne Neagle MS avoided the question I did ask - which was asking whether the funding formula gives providers more money per learner when they make ASBW compulsory, which they do. The FOI my friend who I made the petition with, literally shows that Coleg Sir Gâr receives £365,040 in additional funding from mandating the qualification. This covers the pay of 7 lecturers, who the college wouldn't be able to afford to pay if the college did not enforce this "non-compulsory" qualification. It's clear why colleges across Wales mandate it. The Welsh Government takes away funding which they so very much need if they decide not to mandate this "optional" subject.

The response does not adequately address the issues I raised, but it has managed to ignore the reality on the ground in my college, address any FOI information, or mention any of my legal/wellbeing concerns I raised. I have been explicitly told by my college that Welsh

Baccalaureate can NOT be made optional due to funding, directly contradicting the Cabinet Secretary's claim that schools and colleges aren't financially incentivised to promote uptake. I want to stress again that my college told me I could only drop Welsh Bacc if I made a representation on medical/exceptional grounds, with evidence, because otherwise the college would lose funding. This isn't hypothetical, it is the real explanation I was given when I tried to exercise the "non-compulsory" status I was told existed. So, the Welsh Government, and the Cabinet Secretary herself has told and is telling learners that the subject is not compulsory and institutions use professional judgement, while institutions tell learners something very different. As the Student Union President for Coleg Sir Gâr and Coleg Ceredigion, being aware of the funding the college receives, puts the college in an impossible position in regards to making the subject impossible. It's unaffordable. The response simply pretends this contradiction doesn't exist. At the very least, the Cabinet Secretary should have acknowledged that the ASBW is funded as a separate A-level-equivalent qualification at post-16 education, therefore there is more funding more a programme of 3 A-levels & ASBW than for 3 A-levels only, and that colleges with tight budgets will understandably feel under financial pressure to maximise that income. Unfortunately, the Cabinet Secretary has not engaged with this logic at all.

All of my legal/wellbeing concerns were ignored and not mentioned in the Cabinet Secretary's letter. There is no mention, let alone explanation of how a funding regime that effectively coerces universal participation in a non-statutory qualification can be reconciled with commitment to learner wellbeing and mental health, the requirement to put learners' interests first, and the right of young people to have their views taken seriously in decisions affecting them. Over 1100 people, the majority of whom being students, signed the petition and shared these concerns. Similarly, it does not address the repeated concerns raised by the Children's Commissioner and Senedd Research about the negative impact on wellbeing and workload when Welsh Baccalaureate is treated as universal.

I am tired of the Welsh Government being able to get away with a poor response in regards to the qualification being optional, while indirectly forcing colleges to mandate it for funding purposes. This view is shared with students across Wales.

I would be very grateful if the Committee could seek clear answers to the following points:

Can Medr and/or the Welsh Government provide a transparent example showing the funding difference for 3 A-levels only, 3 A-levels + ASBW, and 4 A-levels without ASBW?

How can the Cabinet Secretary maintain that there is no financial incentive to maximise the uptake of the ASBW, when FOI data shows Coleg Sir Gâr receives £365,040 in additional funding for mandating the subject, and according other FOI data, Coleg Gwent receives over £600,000 in additional funding from mandating ASBW?

Has the Welsh Government carried out any specific assessment of the mental health and workload impact of effectively mandatory Welsh Bacc / ASBW at post-16, particularly for

students from low-income backgrounds, young carers, and learners with existing mental health conditions? If such an assessment exists, can it be shared with the Committee? If it does not exist, how is this compatible with obligations under the Well-being of Future Generations Act?

In light of the Children's Commissioner's concerns about universal Welsh Bacc and the need to respect learner choice, how does the Welsh Government justify a system where colleges tell learners they cannot drop the qualification because of funding?

I would also like the Committee to be aware that my criticism is not of my college. Coleg Sir Gâr is, in many ways, trying to do the best it can for learners in a very difficult financial environment, and I am grateful of the college's openness with myself over why I, and many other students cannot drop the qualification. My criticism is of a national funding regime which publicly insists Welsh Bacc/ASBW is "not compulsory", and privately makes it financially very risky for providers to treat it as genuinely optional.

FOI data from Coleg Gwent shows that it also claimed a substantial sum of over £600,000 a year from compulsory Welsh Bacc participation. This shows that the pattern at Coleg Sir Gâr is NOT an isolated anomaly, but a symptom of the wider funding model.

The Senedd petition by Sam and myself summarises our FOI findings and describes the system as a "manipulative funding scheme" noting a per-student uplift of over £1000, when Welsh Bacc is enforced at post-16 education.

Thank you again for considering Sam and I's petition. We would be very willing to provide the Committee with copies of relevant FOI responses and correspondence if that would assist your work.

Yours sincerely,  
Ioan Armstrong