



Sarah Bartlett
Deputy Clerk
Children, Young People and Education Committee
National Assembly for Wales
Cardiff Bay
Cardiff CF99 1NA

12 January 2014

Dear Ms Bartlett,

Qualifications Wales Bill: evidence session with Universities Wales, 22 January 2015

Thank you for the opportunity to provide evidence on the Qualifications Wales Bill to the Children, Young People and Education Committee on 22 January 2015. In advance of the session we wish to submit our outline views on the Bill, which we hope will be of assistance to you.

Universities Wales is the representative body for universities in Wales and its governing council comprises the vice chancellors of Welsh Universities and the Director of the Open University in Wales. The former Chair of Universities Wales and Vice Chancellor of Bangor University, Professor John Hughes, was a member of the 14-19 Education Review. Professor April McMahon, Vice Chancellor of Aberystwyth University, is a member of the Qualifications Wales Advisory Board on behalf of the university sector.

Universities Wales would make the following points to be considered in establishing Qualifications Wales through the proposed Bill:

Establishment of Qualifications Wales

1. We are supportive of the establishment of a single body (Qualifications Wales) which is responsible for the regulation and quality assurance of all non-degree level qualifications in Wales. We understand that there will also be scope over vocational qualifications, but that the debate over apprenticeships continues to be discussed. In our response to last year's Welsh Government consultation on proposals to establish a new body, we were keen that the current division between the regulatory function of Qualifications Wales and its delivery function could be addressed over time.

Universities Wales (Unis Wales)
2 Caspian Point, Caspian Way, Cardiff CF10 4DQ

Director: Amanda Wilkinson
+44 (0)29 2044 8020 www.uniswales.ac.uk

A National Council of Universities UK
Company limited by guarantee, registered in England and Wales No. 2517018
Charity No. 1001127

Prifysgolion Cymru
2 Pentir Caspian, Ffordd Caspian, Caerdydd CF10 4DQ

Cyfarwyddwraig: Amanda Wilkinson
+44 (0)29 2044 8020 www.uniswales.ac.uk

Un o Gyngorau Cenedlaethol Prifysgolion y DU
Cwmni cyfyngedig trwy warant, a gofrestrwyd yng Nghymru a Lloegr Rhif 2517018
Rhif Elusen 1001127

2. In order to be successful, we concur with the view that Qualifications Wales will need to work in partnership with a range of stakeholders and other organisations. In addition to core provider interests, such organisations include those responsible for careers advice, employers, and universities. Universities Wales understands that the Qualifications Wales Board will not include representation from specific groups, including higher education, but rather will seek individuals with corporate expertise (financial, legal etc). It is absolutely vital that universities are represented appropriately on the Qualifications Wales Board, and it is deeply concerning that universities will not have sufficient representation under the current proposals. Universities Wales urges a rethink on this, to ensure that the higher education voice is heard.
3. In establishing any new body there will be a range of unforeseen consequences, including in this case, the impact on rigidity or fluidity of the curriculum or how existing examination providers will evolve. The real and perceived value of the new body will be important. The new body should prioritise and facilitate the learner journey, raise standards and provide a clear focus on high level achievements.
4. Universities Wales is keen that the new body is established in a cost efficient manner. There will be costs associated with any new arrangement, however. In this case we should expect expenditure requirements not just for establishment but for stakeholders including the training and development of teachers to deliver new requirements. There will also be significant communication costs if the endeavour is to be a success.

Curriculum

5. We note the potential enhanced role the new body could play in setting curriculum requirements and designating subjects. This could be a contentious area and the consultation requirements associated with these functions will need to be clear. The process for determining 'priority qualifications' is a case in point.
6. Response to Welsh Government consultation overwhelmingly identified a role for universities in providing advice on the A level curriculum (although the benefits of university engagement should not be restricted to A levels). Indeed, universities have an important role to play in developing the A level curriculum and in ensuring that A level content supports progression into higher education. University academics and staff are already extensively engaged in this way and have worked with awarding organisations for many years, for example, in providing advice on higher level vocational qualifications, which feed directly into some university programmes.

7. A levels will need to remain broad enough to prepare students for the next stage of life, whether in higher education, employment or other forms of education. Whilst we believe that A levels are broadly fit for purpose for progression into higher education, we support the creation of a body with responsibility to ensure that they continue to meet their objectives and remain robust, and internationally comparable. This is particularly important in an increasingly competitive global job market, where employers are demanding greater numbers of highly skilled individuals.

Communication

8. We feel that the stated aim of Qualifications Wales in *promoting public confidence in qualifications and in the Welsh qualification system* may be too narrow. The new body will need also to inspire the confidence of employers, universities and other stakeholders not just in Wales but across the UK and internationally. The fundamental importance of qualifications extends beyond the individual to include the benefits of a recognised, highly qualified population in attracting employers.
9. Indeed, the importance of recognition and reputation for high quality, relevant qualifications cannot be overstated. In taking steps to differentiate Welsh qualifications, Qualifications Wales must ensure at least parity recognition with its closest competitors – in reality it should be seeking to go well beyond that.
10. We would therefore like to see greater emphasis in the Bill on the European and international dimension of the engagement Qualifications Wales must undertake. Such engagement will include programmes such as the European Qualifications Framework and NARIC (the agency responsible for providing information, advice and expert opinion on UK qualifications worldwide). Welsh qualifications do not and will not exist in a vacuum, and any new legislation should be responsive enough to take account of those developments outside Wales, and avoid an insular approach.
11. We have been very encouraged by the positive working relationship which has been sought in relation to implementing these proposals which has allowed us to avoid the sorts of damaging debates seen elsewhere. The benefits of communication and engagement from a university perspective include:
 - A greater understanding of the content and delivery of new qualifications and hence the incoming skills and knowledge of students
 - An opportunity to forge relationships with pre-higher education institutions and potential future applicants
 - Opportunities to become involved in delivering new qualifications
 - Alignment of CPD programmes to focus on the skills needed to deliver the new qualifications.

We look forward to meeting the Committee on 22 January to discuss these matters further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Wilkinson', with a stylized flourish at the end.

Amanda Wilkinson
Director, Universities Wales