

National Assembly for Wales

Children, Young People and Education Committee

QW 03

Qualifications Wales Bill

Evidence from: ASCL

- 1 The Association of School and College Leaders (ASCL) represents over 18,000 heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of maintained and independent schools and colleges throughout the UK. ASCL Cymru represents school leaders in more than 90 per cent of the secondary schools in Wales.
- 2 ASCL Cymru welcomes the intention to establish Qualifications Wales and the transfer of responsibility for regulation and quality assurance of qualifications awarded in Wales from the Welsh Government to this new body.
- 3 We also welcome the decision to establish this body as a regulator of qualifications in the first instance and not as both regulator and awarder of qualifications.
- 4 It isn't clear how joining the functions of regulation and awarding in a single body would benefit learners, teachers and other stakeholders nor lead to greater public confidence in a Welsh qualifications system.
- 5 Early discussions with Philip Blaker, Chief Executive of Qualifications Wales, about how the new organisation may approach outstanding concerns have been encouraging.
- 6 It is regrettable that the proposal to establish this body was made in November 2012 but that this body will only be established for September 2015. New made-in-Wales GCSEs and A/AS levels and a revised and more rigorous Welsh Baccalaureate have been developed over this period. These new qualifications will be taught in classrooms from September 2015 without having had the oversight of a properly constituted and well-run independent regulator.
- 7 It is unclear how the independence of this new body will be maintained under the arrangements described in the Bill. Welsh Ministers have the power of appointment, the power of authoring remit letters and the power to identify those priority qualifications that require a pre-determined response by the regulator. Moreover, what happens when the new body presents its Annual Report to the National Assembly, and what if the report is found wanting?
- 8 It is fair that proper arrangements are made for those civil servants currently delivering the functions of regulation in the transfer of these functions to the new body. However, the recent history of qualification regulation in Wales does not inspire the confidence that there is sufficient expertise and/or capacity among the current personnel to deliver the robust and high-quality service that should be expected.
- 9 Qualifications Wales will inherit a monopoly arrangement where the WJEC is the single provider of high-status, high-volume and therefore high-risk qualifications,

including new GCSE English and GCSEs in Mathematics. It will need to be effective and vigilant from the very first day of its existence.

- 10 Qualifications Wales will need to reassure stakeholders that there are robust measures in place to ensure that monopoly provider arrangements continue to deliver innovation, responsiveness and a reliable service.
- 11 The Bill allows for Ministers together with Qualifications Wales to produce a list of 'priority qualifications' and within these a further category of 'restricted qualifications'. Qualifications Wales will be able to restrict the number of forms of a restricted qualifications to as few as one. This will only apply to maintained schools. An example is given in explanatory notes: "To take GCSE English for example, this means that a pupil in a maintained school would only be able to take the single Qualifications Wales approved version". Given the troubled history of awarding GCSE English in Wales, it is essential that there is transparency about what is in place to ensure the safety of the awarding.
- 12 It is clear that there is an expectation that Qualifications Wales will encourage more and not less monopoly arrangements in certain key areas of provision that are deemed strategically important by Welsh Ministers. Along with the dangers that are inherent in all monopoly arrangements, it makes the qualification system vulnerable to political turbulence.
- 13 Qualifications Wales will be tasked with 'promoting public confidence in qualifications and in the Welsh qualifications system'. This is very welcome. It remains to be seen how this might be measured, but the aim must be to secure a public perception that made-in-Wales qualifications are valid, reliable and comparable with other well-regarded qualifications available elsewhere in the UK and beyond.
- 14 Qualifications Wales will engage in research. One of the pressures that affect qualifications and how they perform in a school-setting is their use as a measure in school accountability. It would be worthwhile looking at how that pressure can be managed.
- 15 Over time, it should be hoped that Qualifications Wales establishes itself as an authoritative source of independent analysis and commentary on the performance of qualifications and assessment in our system. This might be an opportunity to resolve the standards dilemma: when more of our young people pass the exam, is it because they are getting better teaching or are they cleverer than their predecessors or is it because the exam is getting easier?

05 January 2015