

## National Assembly for Wales Children, Young People and Education Committee

### Qualifications Wales Bill Evidence from: Edexcel (Pearson)

January 2014

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#### **Key points from Pearson response to the consultation, with additional evidence**

##### **1. Pearson supports the proposal for the establishment of an independent regulator and qualification provider**

Pearson fully supports the establishment of an organisation that acts as an independent regulator and qualification provider that will work across the sector to ensure learners have access to the best qualifications available. We believe that competition, when aligned with effective regulation, is the best means of delivering efficient outcomes. In a world of rapid change and constant uncertainty we believe that it is essential to have a vibrant qualifications sector able to react to those changes. Competition can also drive optimal outcomes, in terms of qualification design and implementation.

##### **2. Collaboration with established awarding organisations could be beneficial**

It should be acknowledged that the new independent regulator will not have substantial experience of accrediting and quality assuring high-stakes qualifications. In this sense, we would encourage Qualifications Wales to collaborate with awarding organisations on the information it will need to fulfil its statutory functions, particularly regarding the accreditation and gate-keeping of qualifications. This is to minimise unnecessary bureaucracy and inefficiencies whilst ensuring the regulator protects the interest of learners in Wales.

The Welsh Government recently announced that the WJEC would be the sole provider of the new GCSEs in English, Welsh and Mathematics from September 2015, along with other revised GCSEs from September 2016, as well as revised A/AS levels. We would strongly encourage Qualification Wales to work with us on maintaining standards across equivalent qualifications. This will be important when the structure and design of these qualifications are different (for example coupled verses uncoupled AS) and will be extremely challenging where qualifications contain different content and skills.

##### **3. Learners will benefit from qualifications that are portable**

One aspect that must be considered is the need for learners to have qualifications that are portable across borders, both within the UK and beyond. The most common destination for learners to leave (and enter Wales) is England (<http://wales.gov.uk/docs/statistics/2013/130312-migration-statistics-2011-en.pdf>).

With this in mind, it is vital that learners have qualifications that will be understood and valued by all receiving institutions and other stakeholders in Wales and England. Specific examples would include vocational qualifications which confer licence to practise such as childcare and healthcare qualifications. It is important not to disadvantage learners who may seek to work in other destinations in the UK by restricting the use of qualifications to those conferring licence to practise in Wales alone.

#### **4. Minimising disruption and learner choice**

The proposals contained within the consultation, and the 14-19 Review of Qualifications, will have a significant impact on the experience of all learners in Wales, particularly those that are 14-19 years old. As the provider of qualifications to many tens of thousands of these learners, Pearson is aware and prepared for the changes that are likely to occur as a result of this consultation. Our primary concern is to our learners and to ensuring that their learning experience is not interrupted or impeded by organisational change outside of their control.

We are fully committed to working with the Welsh Government in meeting its vision and ensuring learners in Wales continue to have access to the highest possible quality qualifications in their education. Pearson invests heavily in providing Welsh language translations of specifications and examinations. For example, our Applied GCEs are translated and we have committed to translating all of our new BTEC NGs in the top sectors in Wales.

Our qualifications – our future  
Consultation on proposals to establish a new qualifications  
body for Wales  
December 2013

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### **Section 3: The case for change**

#### **Question 1**

Are there any other barriers to the effectiveness of the current system or are there any other weaknesses? Please give your reasons for your answer and comments.

Pearson does not believe that there are any significant further barriers to the effectiveness of the current system beyond those identified in the consultation document.

#### **Question 2**

Are there any specific features in the current system that you would like to see retained? Please give your reasons for your answer and comments

We believe that competition, when aligned with effective regulation, is the best means of delivering efficient outcomes. In a world where skills are static or the learning content does not change the main benefit of competition will probably be efficient delivery and innovation. However, in a world of rapid change and constant uncertainty we believe that it is essential to have a vibrant qualifications sector able to react to those changes. Competition can also drive optimal outcomes, in terms of qualification design and implementation.

By contrast a system that is reliant on a single supplier of qualifications is likely to become less responsive to the market and less efficient in delivery. It will also be a single point of failure in the system which can often make quick remedial action more difficult to accomplish.

There is a real danger that Welsh learners will, over time, be disadvantaged in the workplace if their education and training through qualifications is not kept at parity with developments in other parts of the UK

Pearson shares with the Welsh Government the frustration of qualification policy decisions being made in England that have an unnecessary impact on learners in Wales. Any changes that allow for Welsh learners to have a stable qualifications system are to be supported. One aspect that must be considered in the education of these learners is the need for them to have qualifications that are portable across borders, both within the UK and beyond. The most common destination for learners to leave (and enter Wales) is England (<http://wales.gov.uk/docs/statistics/2013/130312-migration-statistics-2011->

en.pdf). With this in mind, it is vital that learners have qualifications that will be understood and valued by all receiving institutions and other stakeholders in Wales and England.

Pearson greatly values the excellent working relationship it has with the Welsh Government on matters of qualification and education policy and looks forward to this continuing.

## **Section 4: Our vision**

### **Question 3**

What are your views on our proposed vision for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson fully supports the establishment of an organisation that acts as an independent regulator and qualification provider that will work across the sector to ensure learners have access to the best qualifications available. Pearson is fully committed to its own continuous improvement and working with stakeholders in Wales to ensure its qualifications are fit for purpose for use in Wales, the UK and beyond.

We would encourage Qualifications Wales to work as collaboratively as possible across the United Kingdom and internationally with other regulators and awarding organisations. Pearson would like to see a regulator that stands up and supports awarding organisations when needed to provide reassurance to learners and other stakeholders on the quality of awarded qualifications.

It should be acknowledged that the new independent regulator will not have substantial experience of accrediting and quality assuring high-stakes qualifications. In this sense, we would encourage Qualifications Wales to collaborate with awarding organisations on the information it will need to fulfil its statutory functions, particularly regarding the accreditation and gate-keeping of qualifications. This is to minimise unnecessary bureaucracy and inefficiencies whilst ensuring the regulator protects the interest of learners in Wales.

The consultation suggests that there will be instances where Qualifications Wales may seek to provide qualifications in competition with Pearson and other awarding organisations. Where this occurs, a transparent qualification development and accreditation process, with published criteria that apply equally to all AOs, including Qualifications Wales, will be vital to the credibility of this process.

## Section 5: How we will achieve the vision

### Question 4

What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson is keen to work with Qualifications Wales to achieve its vision for learners in Wales. In this capacity we already work, and will continue to do so, work with a range of stakeholders across Wales in the delivery of our qualifications.

Currently, we believe there is a need for further information on paragraph 5.9 in the consultation document regarding the future qualification provision of Qualifications Wales and other awarding organisations. This is to allow us, centres and learners to be confident in the provision that can be offered in the short, medium and long-term. Awarding organisations are already developing qualifications for September 2015 and 2016 and, to ensure we meet the needs of Qualifications Wales, we need a concrete understanding of what provision we will be able to offer.

It would be helpful to have more information on the quality assurance requirements and their possible criteria that are detailed in 5.1 - 5.13. It is currently unclear when these will be applied and how the benefit of the quality assurance will be measured. Pearson welcomes the scrutiny and reassurance that regulatory approval brings and would be happy to work with Qualifications Wales on how monitoring and other activities can satisfy these proposals.

The proposal in paragraph 5.12 states that qualifications will not be funded solely because they are quality assured by Qualifications Wales; instead funding decisions will be taken by the Welsh Government. Whilst Pearson supports this proposal, it does raise a question as to the future role of DAQW as a database of qualifications in Wales. Currently, DAQW is in the process of becoming a database of qualifications where awarding organisations have applied for funding. As part of developing the proposal in 5.12 further, we would welcome clarification on how future databases of either quality assured, accredited or funded qualifications will function.

### Question 5

What are your views on the proposed governance arrangements for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson has no objections to the governance arrangements in their current detail. We welcome the proposal to work in partnership with Qualifications Wales in the provision of qualifications where it can be done in the best interests of learners in Wales. In any possible collaboration it will be vital that qualifications can still be offered to the necessary standard and service that centres can currently expect from awarding organisations. Pearson would be happy to work further with Welsh Government and Qualifications Wales on the proposals as set out in 5.37.

However, further information is required on how the new regulator will be able to effectively make independent and objective decisions when accrediting Qualifications Wales qualifications and those offered by other awarding organisations. This will require transparency to maintain the confidence of those developing and delivering qualifications for learners in Wales. As part of this, it will be vital that qualifications awarded by Qualifications Wales are held to account in the same way as those by other awarding organisations, as detailed in proposal 5.23.

### Question 6

What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit? Please give your reasons for your answer and comments.

Pearson fully supports the proposed scope for Qualifications Wales that is set out in **paragraph 5.20. This states that the new regulator will 'set high level design principles for qualifications that allow awarding bodies to deliver in Wales those qualifications that they also offer elsewhere such as in England and Northern Ireland'.**

This aspect of qualification provision is vital to learners in Wales who will, in many cases, be using their qualifications to progress to opportunities outside of Wales. Likewise, it enables learners from outside Wales to progress in education and employment within Wales.

### Question 7

What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales? Please give your reasons for your answer and comments.

Public confidence is a vital component for any educational jurisdiction.

We would encourage Qualifications Wales to use the expertise of organisations such as Pearson to provide support in strengthening public confidence in qualifications awarded to Welsh learners. This will allow the new regulator to broaden the expertise within its regulated portfolio and bring best practice from around the world into the learning environments of Wales.

Pearson has recently announced details of its World Class Qualifications project (<http://uk.pearson.com/world-class-qualifications.html>). This project aims to ensure that Pearson qualifications uphold an internationally benchmarked standard and are demanding, rigorous, inclusive and empowering.

As part of its work on World Class Qualifications, Pearson has developed a suite of Level 1 / 2 vocational IVET qualifications that are now available in Wales. These BTEC Level 2 next generation qualifications **are the successors to Pearson's existing BTEC Level 2 QCF provision.**

More information on these qualifications is available at <http://www.edexcel.com/quals/firsts2012/Pages/default.aspx>. We have worked closely with teachers, learners and a range of other stakeholders to develop these qualifications and ensure they represent the very best progression opportunities for level 2 learners, and a platform from which to build the skills required by employers and Higher Education providers in global markets. The majority of these qualifications will be fully available in Welsh and English.

### Question 8

How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders? Please give your reasons for your answer and comments.

Clearly the proposals contained with the consultation, and the 14-19 Review of Qualifications, will have a significant impact on the experience of all learners in Wales, particularly those that are 14-19 years old. As the provider of qualifications to many tens of thousands of these learners, Pearson is aware and prepared for the changes that are likely to occur as a result of this consultation. Our primary concern is to our learners and to ensure that their learning experience is not interrupted or impeded by organisational change outside of their control. We are fully committed to working with the Welsh Government in meeting its vision and ensuring that learners in Wales continue to have access to the highest possible quality of qualifications in their education.

### Question 9

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

We do not have any further questions at this point and would only reiterate our desire to work with the Welsh Government and the future Qualifications Wales whenever possible.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: