

Cyflwynwyd yr ymateb hwn i ymchwiliad y [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) i egwyddorion cyffredinol y [Bil Addysg Drydyddol ac Ymchwil \(Cymru\)](#)

This response was submitted to the [Children, Young People and Education Committee](#) inquiry into the general principles of the [Tertiary Education and Research \(Wales\) Bill](#)

TER 20

Ymateb gan: Adran Addysg Cyngor Sir Caerfyrddin

Response from: Carmarthenshire County Council Education Department

1. Does CTER have the ambition, reach and capacity to lead the development of an equitable and coherent tertiary sector building on the Curriculum for Wales's learner centred ethos or could this be jeopardised by CTER having a managerialist approach?

1.1 The Curriculum for Wales (CfW) is a paradigm shift from a system focussed, performance indicator driven and top-down education provision to a learner centred and local approach. CTER is envisaged as having a Civic Mission which should reflect this learner centred ethos and which the 4 purposes approach to the CfW aims for.

1.2 Removing the 'local' context from the formula CTER appears to be planning to use for the decision-making process on what constitutes effective provision could be a recipe for disaster. It completely undermines the subsidiarity, local emphasis and autonomy over education currently being developed through the approach of the CfW. Indeed, it looks to be creating a 'bipolar' system. It threatens to ignore the crucial local intelligence Local Authorities and their schools share about their learners and needs. It could be argued too it implies an insidious political aim to undermine the role of Local Authorities and their schools as tertiary education providers. This implication is reinforced by the removal of sixth forms from many aspects of the legislation, in particular the learner protection and engagement ones. As a result, CTER does not appear to have the capacity for a coherent approach.

1.3 Indeed, it appears that there is a risk CTER will perpetuate a top-down system unless it's capacity to create 'Outcome Agreements' attempts to embrace wider notions 'value' and 'quality' in line with the CfW, and not in the vague ways both of these terms are used in the Bill's explanatory memorandum which imply a narrow assessment of both, based mainly on external assessment, and in the case of sixth forms UCAS destination outcomes. At university level, ways of assessing which

capture a wider net of a learner's value are moving apace which CTER must be abreast of in addition to way education and learning are changing as a result of the CfW.

1.4 There is a general concern that CTER, or those proposing it in the first instance, have no understanding of what happens in schools and especially what has been happening during the pandemic. There appears to be no idea how much learner centred support for making progress and in deciding on next steps into employment or HE learners are receiving in schools in comparison to some other tertiary providers. The pandemic has brought into sharp focus how learning is relational and not transactional, with trusted relationships for supporting well-being the foundation for learning and progress. The vision propounded for CTER just does not appear to embrace any conception of 'value' beyond the metrics of the financial and external exam results. How can CTER use a centrally derived measure for financial sustainability and also embrace local needs and differences, especially the needs of rural and Welsh Language sixth forms and learners? In addition, the needs of small sixth forms who build a local and/ or Welsh Language ethos which could be dissipated with their loss?

1.5 One of CTER's main roles appears to be to tackle disadvantage but CTER's narrow approach to judging value could make the problem worse by simply seeing more vocational opportunities as the solution. The message from the pandemic has been that disadvantage is tackled through learner centred support and building trust and relationships with parents/ guardians and support networks outside school: removing the wall between the school and the community. Indeed, it has been clear from the pandemic (and before) pushing learners onto pathways too early can actually engender disadvantage; moreover, pushing learners whose disadvantage may have made a particular employment or educational pathway challenging in a certain direction will not achieve equity. The equitable aim of the CfW is to enable learners the experiences to develop the skills and dispositions for a fruitful education and life; however, CTER's approach may have the unintended consequence of placing learners in boxes according to background even more than before and thus increase disadvantage.

1.6 CTER will not be responsible for Additional Learning Needs (ALN) funding which reinforces the impression it will not be learner centred in its work.

1.7 CTER is aiming to create an overarching database of learners' tertiary pathways including Higher Education (HE) pathways to track each learner across all sectors, and thus be able to analyse and evaluate trends and outcomes. This information needs sharing with Local Authorities so they can undertake their own analysis and evaluation of the pathways its learners are taking and how effective provision is.

2. Will CTER be properly in line with the Future Generations Act?

2.1 In rural and coastal areas there are particular challenges for collaboration so learners may have limited pathways. The use of collaboration using hybrid technology needs development for overcoming this for rural learners; moreover, sustainability in rural areas means more than ensuring provision costs are good value. Indeed, the Future Generations Act is designed to reduce carbon emissions through unnecessary travel and support the social, linguistic, cultural and well-being needs of learners outside the main conurbations in Wales. Often rural communities have significant Welsh language learners too. The realisation in recent years that by closing small rural schools there is a loss to a community should be considered by CTER as a loss of value which can't be quantified in a monetary way. Therefore, CTER must have the representation on its board that understands the needs of learners from all backgrounds and the challenges learners face in different settings when deciding how it measures value.

2.2 Also, CTER have the welcome capacity to support work experience, and this could provide the opportunity to create a national database with hybrid work experience opportunities so with the support learners from rural areas could do work experience part online combined with a face to face 'city' based aspect. Obviously, this could work in reverse too.

2.3 CTER's aim to increase participation in tertiary education is admirable. As part of this ambition is promoting lifelong learning so those over the age of 19 can access different learning pathways; however, in rural areas the providers are in the main schools which have learners below the age of 19. To have a coherent and effective tertiary model for lifelong learners CTER must consider how a network of provision-again this could be developed around a hybrid model-can be put in place.

3. Will CTER ensure coherence in learner representation and engagement?

3.1 This requires CTER to be able to access learner voice in a coherent and inclusive way. There needs to be more than one learner on the Commission and, more importantly, a structure beneath CTER which can capture learner voice in an inclusive way. This may require support and training to provide learners with the voice to feel able to contribute to CTER's work in a meaningful way.

3.2 Indeed, having separate learner protection and engagement procedures for sixth forms and other providers lacks coherence. The Bill suggests complaints made to sixth forms are responded to by governors as part of a school's complaints procedure. However, Local Authorities are the registered provider, and will have to deal with the problem if the Commission finds any tertiary provision unsatisfactory. Therefore, it would be logical for a local authority to have oversight of any complaint.

Moreover, this should extend to all the learners within a local authority as if provision is unsatisfactory in a Further Education college this may have implications for the learners and sixth forms within that local authority.

3.3 An aspect of the explanatory memorandum that is problematic (3.363) states that for sixth forms most complaints will be by 'parents'. This may be the case (although unless supported with data suggests a degree of in-built bias) but how or more importantly why might this not be the case for other 16-19 Tertiary providers? Is it because learners are more likely to make complaints themselves outside sixth forms? Or more apposite, perhaps complaints don't occur without parental support, and many learners outside schools are voiceless at present. This reinforces the need for CTER to play an active role in creating structures to support learner voice

3.4 Similarly, it is not clear if a Learner Engagement Code is envisaged as being applicable across all learners within a local authority or whether school sixth forms will have different ways of achieving this than other providers. This would help develop a coherent approach if the same for all but will require collaboration and standardisation of an approach if it is to be equitable.

4. Does CTER have the ambition, resources, and capacity to support the aim to have one million Welsh Speakers by 2050?

4.1 The success of the Welsh in Education Strategic Plan (WESP) in Carmarthenshire is seeing a rapid and exponential demand for more Welsh Language pathways for all learners at tertiary level. By stating that CTER should just make 'reasonable' provision for Welsh Language provision is alarming, and without a clear and robust commitment to support Welsh Language Pathways learners will be forced to choose English Language pathways. This is especially the case for vocational pathways and also 'academic' subjects which historically have small numbers e.g., Modern Foreign Languages. Parity for Welsh Language should be CTER's goal.

4.2 The Bill gives CTER the power to provide appropriate provision including facilities for further education, but sixth forms are not included in this. Support for capital expenditure whether buildings or hybrid technology for the development of Welsh Language Pathways, including apprenticeships, must also be given to sixth forms who in many areas are the main if not only source of Welsh Language provision.

4.3 The welcome addition of apprenticeships to sixth forms in general making this not just an issue for Welsh Language learners. Providing support and working with stakeholders including the RLSP to provide carbon friendly and innovative ways to follow vocational pathways through expansion of sixth form provision especially in rural areas will also need strategic thought and capital investment.

4.4 CTER should also ensure Welsh Language pathways can be accessed in Higher Education are further developed and signposted to learners at appropriate transitions in their education. This should be supported by Welsh Language employment opportunities.

4.5 In fairness, the Bill does set out a range of strategies, from teacher/ professional development for more Welsh Language Teaching Provision to supporting new Welsh Language courses, but the commitment must be more than 'reasonable'.

5. Will CTER's use of powers to challenge the effectiveness of provision have the capacity to prevent any negative impact on learners and support new provision?

5.1 It can't be stressed enough how any concerns over provision must include the Local Authority, the school sixth form(s) raising concern and CTER in forthright but constructive discussions at the earliest possible juncture

5.2 There must be collaboration and support in developing and using effectively all available qualitative and quantitative data and information for early identification of problems. Followed by a rigorous process of mapping out, planning for and introducing the sorts of change required by any unsatisfactory provision. Work to explore how Local Authorities can ensure effective changes are made for different scenarios needs to start at a strategic level now. There must be an agreement on how constructive change can take place.

6. Will Estyn's role outlined for tertiary education in sixth forms further hamper coherence?

6.1 There is a confusion here too in the role Estyn might take in this. Historically, Estyn have provided challenge but often not the support to effect the change required for meaningful improvement. There must be a forum for and the resources to effect constructive change across authorities and in liaison with CTER.

6.2 In addition, authorities and councils have to be involved in any concerns over FE provision as they have a duty to protect the needs of learners living therein. There must be a consistent approach from all tertiary providers for this. Removing provision could be a short-term disaster for learners; therefore, intervention and support to avoid this must be a priority and/ or suitable transition arrangements put in place. The 5 ways of working emphasizes long term thinking, prevention and integration. These have to be central to this.

7. Does CTER need its own premises?

7.1 The estimated cost of introducing CTER is stated as £18 million over retaining the status quo. The Bill states it sees building location and staffing as the main reason for

this. Could CTER use Regional Education facilities, Higher Education facilities or Local Authority facilities in combination with hybrid working on a rotational basis as its work extends to all parts of Wales? Data could be centralised without affecting CTER's work?

Appendix

Case Study: Sixth Form Support during the Pandemic

Interview with Head

Evidently, all age groups have been, and are being, adversely affected by the pandemic not just sixth formers. The transition from primary to secondary has given rise to issues around peer group needs and the way school bubbles have undermined friendships. Conflict within bubbles has emerged because of learners' sense of isolation and unhappiness, and other social needs because organising the school to mitigate Covid transmission has caused or exacerbated a problem. This gives an idea of the intensity of relational work and degree of support for learners. It is important to note as many of these learners will be entering the sixth form around the time the CTER will be established. The emphasis again is on how schools and sixth forms have the holistic knowledge and understanding to support learners in the most learner centred ways.

Indeed, in relation to the sixth form, the head of the school has observed that many of the Year 13 learners have not had any plan beyond getting through Covid, and are deciding on next steps when some 'normality' returns. This despite multiple interviews with the learners and various talks and events. Unfortunately, a significant number of learners who have lacked support at home and found the transition to A levels challenging without more face-to-face time with teachers have decided a third year in sixth form is the only way they can complete all of their courses.

Again, recently, the Head and other senior leaders have set aside 3 days for small groups of learners in his/ her office to help with Welsh Baccalaureate, UCAS applications and other subject specific work. In the main, learners lack the independence usually scaffolded over the sixth form. The lack of opportunities to develop agency through organising Eisteddfodau, show and sports' events has also affected the learners' level of maturity. This reflects how much the ethos of a school and extracurricular activity opportunities contribute to a civic mission and engender positive competences and values. This wider notion of value and experience beyond the financial and external exam result has been shown to be vital for a learner to succeed in education and life.

Feedback from interviews with heads of sixth form and learners

The head of sixth form in essence presented a picture of her learners as a whole suffering long term stress due to the pandemic: 'the main thing is their mental health and well-being to be honest with you. It's clear, talking to a variety of students how much they are struggling with their mental health'.

She stated learners could be separated broadly into either a 'fight or flight' group. This irrespective of prior academic achievement or socio-economic background. The flight group have lost any sense of purpose and need constant support to catch up. whilst the fight group, who are anxious to get good grades, can be 'triggered' into a stress response by any talk of deadlines or exams: 'You have to be very careful about how you say things and word things because you could be triggering a stress response'. This was supported by interviews with two groups of learners who could be seen to fall into either category. One in the fight category mentioned how trying to work at home became impossible because

'your home is like where you know you relax... but then trying to work from my bedroom... like every day and just trying to do work, like it was fine at the start... but in the end it just got too much, and motivation went so it was just like, oh, I can't do this anymore, ...[it] affected me mentally, I just didn't want to get out of bed'.

The learner and others praised the school for the mental health support provided during lockdown which included phone calls, messaging and emails. This level of support has been augmented by face-to-face weekly catch ups, one to one tuition, and extra UCAS and Careers advice since returning to school.

Those in the fight group mentioned upcoming mock exams which they wanted as they had not taken exams since Year 10 but the thought of it caused stress. This stress response appears to have made it difficult for the fight group to think ahead. All aspired to study at university but none applied: 'I'm still uncertain what I want to do. I know I want to go to university and get a degree, but what course?... We haven't had much time to like talk about it and consider the options and see what's there.'

It is clear this sixth form has gone to enormous lengths to support their learners. Knowledge of, and relationships with, each individual learner has enabled them to offer individual support. The deputy head of sixth form felt the pandemic had highlighted how important this was for any academic work to take place. She also thought the increased emphasis on relationships and well-being was essential to help future years who are affected and yet to join the sixth form, and support also the Curriculum for Wales.