



**WALES
CYMRU**

**RESPONSE TO:
Consistent measures for post 16
learning in Wales**

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1. The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales.

2. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world. It was formed on the 1st June 2006 by the amalgamation of two strong partners – the Association of University Teachers (AUT) and the National Association of Teachers in Further and Higher Education (NATFHE) – who shared a long history of defending and advancing educators’ employment and professional interests.

3. We welcome the opportunity to respond to the consultation on consistent measures for post 16 learning in Wales.

4. The University and College Union does not agree with the use of performance measures as a proxy for institutional quality. Blunt performance data such as those proposed by Welsh government fail to reflect the often excellent work that schools and colleges do or the value they add to pupils’ and students’ progress outside raw examination achievement, nor does it account for the intention of the learner who may not have undertaken learning with a view to ‘progress’.

5. UCU would also make the further recommendation that if the proposals are pursued, then the data measured might paint a more accurate picture if it highlighted trends in performance based on rolling averages over 2 to 3 years rather than a snapshot of the performance of a particular cohort.

6. We have responded to this consultation in the spirit of trying to improve information available for learners rather than supporting the use of such information to compare the performance of providers or hold them to account.

Q1. Do you agree that there is a need to change the existing performance measures for sixth forms and FE colleges? Please explain your reasons.

Yes. We agree that current practice does not allow easy comparison across the post 16 sector. This issue must be addressed if we seek to promote parity between vocational and academic pathways and providers.

However, we seek clarification over the precise purpose of the performance measures proposed. Are they to measure all post 16 education and training, or just level 3 qualifications for 16 – 19 year olds? If the latter is the case, we do not see how the new measures will help students to make informed decisions regarding the breadth and quality of available qualifications, for them to follow the learning pathway most suitable for their individual needs.

From our perspective, if the data does not reflect the full availability of qualification choices, we will fail to address issues of parity between vocational and academic aptitudes and therefore miss the entire point of devising a system, which will provide a level playing field for schools and colleges.

If the purpose of the data gathering exercise is simply to enable the comparison of the number of 16 -19 year old students who gain level 3 qualifications in 6th forms compared to the FE sector, then this should be made clear and the measures should not be badged as 'post 16'. The post 16 sector deals with far more than level 3 qualifications for students under the age of 20; to exclude all other data from a measure of 'effectiveness' is a huge injustice to the FE sector. Without providing the public with a balanced and comprehensive view of the work undertaken by the colleges, their role in the promotion of viable alternative qualification routes will continue to be undervalued, which consequently will do nothing to promote the take up of apprenticeship places, as they are likely to remain a 'second-class' option.

We have concerns that the metrics used may well indicate the number of level 3 qualifications gained and perhaps the grades attained, but will give little indication of the quality of the learning process and personal development needed to get there.

Q2. Do you agree with the overall principle of having a consistent set of measures, where possible, where learners are undertaking similar learning programmes in different settings? If not, please say why.

Yes, but there should be a commitment to having consistent measures across similar programmes in different settings in all cases, not just 'where possible', otherwise this surely defeats the object. (see above response)

Q3. Do you agree that the measures are appropriate? Are there any other measures that we should consider?

Learner achievement would seem to be an obvious measure of effectiveness, however care should be taken that in order to achieve a successful outcome, the quality of the teaching and learning experience is not compromised. Pressure to achieve criteria needed to gain a qualification, can sometimes have the unintended consequence of undermining the learning processes needed to ensure that the result is meaningful. The pressure of receiving funding based on results can have this effect, where teachers and lecturers find themselves in the position of having to favour quantity of learner achievement over quality. The inclusion of distinguishing grades will only add the pressure to increase grade profiles, which is not the same as improving quality. We must accept that there is a normative curve and it is not possible to have a majority above the average.

The assumption that “...learners starting on an A level programme generally have the aspiration to complete the two year programme [] and typically progress on to higher education.”, and should therefore be measured differently, only serves to degrade vocational qualifications further. If we are ever to recognise that vocational qualifications are of equal value to traditional academic qualifications, we must not reinforce this distinction.

UCU Wales does not accept the position that A level routes and entry to higher level learning is the best route for all. We must provide equal alternatives that enable everyone in Wales to develop their skills and talents and not reinforce the message that the A level route is the preferable route. Many students engaging in vocation qualifications in FE colleges also aspire to higher learning and complete their course in two years. The proposal seems to imply that those undertaking vocational programmes do not have aspirations.

Further this proposal will defeat the object of having consistent measures across the post 16 sector and will perpetuate the distinction between 6th forms and FE; again sending out the message that they have different values in society.

We welcome the proposal to exclude Welsh Baccalaureate programmes in the first instance; we agree that there are issues with this qualification that need to be resolved before meaningful data can be obtained.

Post-16 value added. UCU Wales would welcome clarity over the definition and measurement of ‘value added’. Will it be based on prior attainment, i.e. what the student has already achieved, or will it be based on predicted grades. It is not uncommon for students to present at FE college interviews with impressive predicted grades that are not then achieved. Therefore as part of any pilot scheme that involves the use of predicted grades, we would

like to see further investigation of the validity of such a method being used to measure progress.

There is the assumption that those who do well at GCSE's are more able than those who do not; again reinforcing the idea that qualifications that are not GCSE's are not as valuable and therefore neither are the individuals that gain them. There are many able and talented people whose skills are simply not catered for in the existing school curriculum, as can be evidence by those that then progress to the FE sector and flourish.

We are concerned that only level three qualifications will be included in data collection and fail to see how this will represent an accurate picture of the work carried out in the FE colleges. If we use this as a measure, are we again accepting that the value of post-16 education is only successful if it results in qualifications at higher levels? If so this would be to ignore some fundamental purposes of the role of teaching and learning, such as building confidence, or the sometimes necessity to move sideways, before being able to move forwards.

Further, if we accept that all learners learn in their own individual way and pace, measuring progress relative to that of other learners, as according to the definition of value added, it does not reflect the true value of the distance travelled for each student. Therefore we question the assumption that 'value added' if measured as described, provides valid information on progress.

We agree that if there is to be a system used to measure outcomes in post 16, then systems used across all schools and colleges must be compatible. However it would also be useful to ask the students directly, about their own views on the value of the courses that they undertook. We would also welcome further information on and inclusion in consultations on the development of such a system.

Destinations. We welcome the proposal to set up a government led destinations data system, as it can be a challenge for FE staff to gather such data after students have left the college. However, whilst it is a useful exercise to gather destination data in terms of informing the need for future provision, it doesn't necessarily tell us anything about the quality of the programme of study. Factors such as the availability of related employment, will impact more on student destinations than their achievement of a qualification.

In addition, to look at success as being only further learning or employment, is to devalue other life choices that students may make after post 16 study; some may take gap years, or career breaks for example and we question that levels of earnings and benefits are really a measure of success.

We are concerned over the exclusion of level 2 and below qualifications. There is much governmental debate at present as to the value of such

courses; the data collected could be beneficial in terms of policy decisions on the future of lower level course provision.

Other measures in addition to the suggestion to canvass completing students as to the value added benefits of a particular course of study, it could perhaps be useful to gather data from universities and employers on the suitability of the knowledge and skills possessed by new students/employees on arrival at their destinations. This would provide a more accurate indication of the quality and usefulness of a programme of study, in the real world and would also help to validate 'learner achievement' outcomes, as the quality of the qualification would be tested, by the ability to apply the learning undertaken.

Q4. Do you agree with the proposal to remove the current age restriction in place for sixth form learners (those learners aged 17 at the start of the academic year) to include all learners undertaking full-time level 3 general education programmes in sixth forms and colleges?

Yes – measures across all post 16 provision should be consistent, however we seek clarification as to exactly what all 'all ages' covers if it excludes part time students, who are likely to be those attending FE colleges, specifically adults. The FE sector is not just a vocational 6th form and the variety of work that is undertaken in the sector should be recognised in all post 16 performance data.

Q5. Do you agree with the principle that we should measure level 3 general education outcomes over a two year period?

Two year courses should be measured over a two year period, however AS and A levels are different qualifications each lasting one year and should be measured as such. It would be a useful exercise to measure the level of students that leave 6th form at the end of year 12 and transfer to FE. However we would recommend that data gathered should be used to highlight trends over a 2-3 years period, rather than being used to provide a snapshot of information based on a single cohort.

We disagree with the proposal to limit measurement to level 3 qualifications regardless of them being either general education or vocational. One of the key roles of FE colleges is to provide alternative level 2 course for those who did not achieve satisfactory GCSE outcomes at school, to enable them to progress to level 3 qualifications. If this data is not collected, it undermines the value of the crucial role that FE plays in providing equality of opportunity

for those who are not suited to, or whose circumstances have prevented them from accessing the traditional school curriculum.

Q6. What are your views on our proposed approach to the introduction of a national model for measuring value added? If you are a learning provider and already use a value added model, please let us know what features are particularly valuable and should be included in our future approach.

We agree that post 16 measures for learning in Wales should be consistent and therefore support a national model, however we have concerns about the practise of measuring ‘value added’ (see Q3).

“Post-16 value added. UCU Wales would welcome clarity over the definition and measurement of ‘value added’. Will it be based on prior attainment, i.e. what the student has already achieved, or will it be based on predicted grades. It is not uncommon for students to present at FE college interviews with impressive predicted grades that are not then achieved. Therefore as part of any pilot scheme that involves the use of predicted grades, we would like to see further investigation of the validity of such a method being used to measure progress.”

“Further, if we accept that all learners learn in their own individual way and pace, measuring progress relative to that of other learners, as according to the definition of value added, it does not reflect the true value of the distance travelled for each student. Therefore we question the assumption that ‘value added’ if measured as described, provides valid information on progress.”

Q7. Do you have any views on what should be defined as ‘positive destinations’ for post-16 learners?

Positive destinations are an important outcome of learning and it is good that students should have access to information about where their course might take them in the future to help them make decisions about their study. Data should include self-employment, voluntary work and privately funded study.

With regard to adult learners and for FE in particular, distinction should be made between those already in sustained employment when undertaking a course, and those who find employment after their course, otherwise providers who work with large numbers of learners already in employment will appear to achieve very successful destination results, whereas those working with people not in employment will struggle to achieve the same level.

Please see Q3 – Other measures

“...it could perhaps be useful to gather data from universities and employers on the suitability of the knowledge and skills possessed by new students/employees on arrival at their destinations. This would provide a more accurate indication of the quality and usefulness of a programme of study, in the real world and would also help to validate ‘learner achievement’ outcomes, as the quality of the qualification would be tested, by the ability to apply the learning undertaken.”

Q8. Do you agree that performance data should be widely available to the general public via an online portal?

It is hoped that one of the outcomes of this exercise is to assist students and parents in making informed choices about post 16 education and training routes. Therefore it should be widely available. However care must be taken to ensure that the purpose of the data is crystal clear, which is why we are clear that all levels of course data should be included. The value of alternative courses compared to traditional GCSE's and A levels needs to be promoted and celebrated by Welsh Government, to help remove the stigma that currently surrounds choosing vocational qualifications and attending an FE institution. School league tables and categorisation are both examples of how data sharing can create unintended consequences.

The data presented in this consultation largely equate quality of an institution to performance in exams. Knowledge about exam performance alone cannot support learners and parents to make the most informed decisions. Further one of the primary factors in decision making for students choosing a provider, is location. Performance data for many, is not relevant to their decision making process.

Q9. Do you have any views on the proposed timetable or any issues that may impact on our ability to achieve it?

No, other than the process should be regularly reviewed.

Q10. Do you agree that in calculating the outcomes of general education programmes, we should include A/AS level equivalents (qualifications of a comparable size and points value such as the Welsh Baccalaureate Skills Challenge Certificate and BTECs? Do you have any comments on specific qualifications or types of qualification that should or should not be treated as equivalents? If so please state why.

From the information in the consultation paper it is not clear what is meant by this question as General Education Programmes are listed as separate to the Welsh Baccalaureate, however the Welsh Baccalaureate is likely to be included in vocational programmes followed in an FE college.

Further the achievement measures for vocational programmes in table 3 indicates that qualifications will be measured by level, however only level 3 qualifications are referred to in the rest of the document, so we are unclear as to whether all qualifications at level 2 and below, will be included in this measurement.

As stated in Q5

“We disagree with the proposal to limit measurement to level 3 qualifications regardless of them being either general education or vocational. One of the key roles of FE colleges is to provide alternative level 2 course for those who did not achieve satisfactory GCSE outcomes at school, to enable them to progress to level 3 qualifications. If this data is not collected, it undermines the value of the crucial role that FE plays in providing equality of opportunity for those who are not suited to, or whose circumstances have prevented them from accessing the traditional school curriculum.”

Q11. Do you agree that it would be helpful to publish breakdowns of grades achieved for A levels, to show outcomes for individual subjects where there are sufficient numbers of entrants?

Yes and no. Whilst grades are the ultimate symbol of a successful outcome, they are not necessarily an indicator of the quality of the process that has gone in to achieving that outcome.

The quest for higher grades can become the focus of attention and create enormous pressure on students and staff to continually achieve and improve. There is a limit to how much can be done to improve a delivery before it becomes change for the sake of change. We also need to stop reinforcing the message that success is only represented by A* grades.

Currently some subjects, for example psychology, are delivered on behalf of the school by the local FE college. In such cases who is really responsible for the outcome?

Q12. Should we include grade outcomes for vocational programmes? Should this be at level 3 only?

No, data should be collected at all levels, not just level 3 (see Q 5) also see comments above.

Q13. 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:

UCU believes that students and parents should have straightforward access to good, relevant information about courses and institutions. However we do not believe that the use of data stripped of context is helpful for learners making choices, nor does it reflect performance meaningfully for accountability purposes

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: