



**WALES  
CYMRU**

## **RESPONSE TO: Qualifications Wales- Qualified for the Future**

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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.

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.

We welcome the opportunity to respond to Qualified for Life consultation.

UCU are disappointed by the lack of scope in this consultation, by the assumption that current GCSE structure of examinations is not part of the scope of this consultation. We believe that given the significant time and resources which have already gone into delivering Donaldson recommendations in Wales, the failure of Qualifications Wales to pause and reflect on the appropriateness of maintaining the current exam structure and tinkering at the edges, is effectively failing the learners in Wales.

UCU are actively engaging with civil servants and politicians whenever we can about the importance of understanding pedagogy and the difference between vocational and academic learning practices. Because of its importance we commissioned an expert in the field to produce our response to the relevant sections of the PCET consultation. We reproduce that submission in full below, with the references to the paper at the end of this submission.

The arguments put forward in this paper illustrate quite clearly for us why, in responding to this consultation, we must urge that much more consideration is given to the issue of pedagogy in the current work of Qualifications Wales in developing an appropriate qualifications structure which is in our view fit for purpose and doesn’t end up undermining the intent behind Donaldson’s recommendations and the significant work done to date in preparing the new curriculum.

## **Public Good and a Prosperous Wales**

### ***Reflections on the PCET reforms for UCU Wales***

**Bill Lucas<sup>1</sup>, Professor of Learning and Director of the Centre for Real-World Learning,  
University of Winchester**

#### **1. Scope**

These reflections on the Welsh Government consultation do not seek to be comprehensive. In terms of their focus they draw on my expertise in exploring the purposes of education, in pedagogy (general, vocational, apprenticeship), in workforce skills, in work based learning and on the issue of parity of esteem across pathways.

After some headline observations I respond to questions 14, 15, 16 and 22 in the Consultation Document where I can contribute expertise.

#### **2. Headline observations**

The attempt to coordinate post 16 learning and education in Wales by the creation of a new coordinating body, the Commission is very welcome. Equally commendable is the powerful ambition to value both 'vocational' and 'academic' routes equally (although I do not accept this stark delineation between them). The ambition to learn from the best in the world which permeates the Consultation document is admirable, too.

#### *Unresolved tensions*

There are some unresolved tensions in the Consultation including:

- a) reconciling the vision of the Well-being of Future Generations (Wales) Act 2015 with the largely economic drivers which predominate in the Consultation;
- b) balancing national skills needs with global thinking about the purposes of education systems;
- c) recognising the very different contexts of school, college, university and work based learning in terms of their pedagogy; the 'key challenges' section of the Consultation (pp 9-10) makes no mention of this;
- d) moving beyond a binary view of 'academic' and 'vocational' systems in order to build parity of esteem.

Put more specifically, the Consultation focuses on structural issues rather than on pedagogy, the core of what drives the quality of learning across the different sectors which the Consultation is seeking to join up. If the Hazelkorn recommendation to create an integrated PCET system in Wales is to be realised, then that system needs an overarching vision for what its desired outcomes are, an holistic and aspirational vision of the purposes of education in Wales. Against such a vision decisions about pedagogy

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<sup>1</sup> Bill Lucas recently chaired the creation of the professional teaching standards for the further education and work-based learning sectors in Wales. He is the author of a number of well-regarded research reports on vocational pedagogy, apprenticeships and employability, see references.

can be taken; without it a paper like this is necessarily a more abstract structural conversation.

*(a) A lack of commitment to well-being*

With regards to well-being and resilience (p13) it is not clear how it is envisaged that the joined up systems of school, college, work based learning and universities will develop a more resilient or healthier Wales. Across the world there are examples of educational administrations seeking to do just this. The State of Victoria in Australia has set explicit targets for resilience and health, for example<sup>2</sup> <sup>3</sup> in their schools, which might be emulated across all sectors in Wales. In vocational settings I have argued that resilience needs to be an explicit goal of FE and work based learning, (Lucas, Spencer and Claxton, 2012, pp 42-54), specifically a combination of resourcefulness and wider skills for growth. Impetus, 2014; pp 17-24) argues that resilience is essential for work. Interestingly the Confederation for British Industry (CBI, 2012) has made similar arguments, suggesting that grit, resilience and tenacity are essential outcomes from school. From the university perspective, resilience is becoming an issue of well-being and drop from courses, (McIntosh and Shaw, 2017). The Consultation neither acknowledges the need to make resilience an explicit goal of all education sectors, nor considers how resilience may be developed.

*(b) An outdated model of education*

Notwithstanding the very contemporary ambition of more joined-up provision, the language of the Consultation is strangely backward looking and pays little attention to developments across the world. It is littered with references to skills, has just seven mentions of the word knowledge and no acknowledgement of broader concepts such as competencies, capabilities or habits of mind. If four sectors – schools, FE, work based learning and HE are to be dealt with are holistically then it will be important to find a common language.

The OECD (2016; p 2) has articulated a model for Education in 2030 which indicates the need to think beyond knowledge and skills, see Figure 1:

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<sup>2</sup> <http://www.education.vic.gov.au/about/educationstate/Pages/targets.aspx>

<sup>3</sup> <http://www.education.vic.gov.au/about/educationstate/Pages/targethappyhealthy.aspx>



Figure 1 – Education 2013, OECD

Competencies (or what countries such as Australia and Finland, for example, refer to as capabilities) are here shown as the complex interaction between knowledge, skill, values and attitudes. It is a model of this complexity but clarity which will be helpful if the four different sectors being brought together in the new body are to buy in to the vision.

An indication of this kind of thinking can be seen in the innovative domain tests being developed by PISA. In 2015, for example, it was ‘collaborative problem-solving’ and, in 2021, it will be ‘creative thinking’. But in the Consultation there is no recognition at all of these kinds of capabilities being desirable or valued. Arguably they could be a powerful way of aligning the needs of ‘academic’ and ‘vocational’ pathways.

In the last decade we have begun to understand with greater clarity those capabilities which are particularly useful. The two lists in Table 1, the first from an economic perspective (Heckman & Kautz, 2013) and the second from educational researchers (Gutman & Schoon, 2013) are useful here. Both sets of researchers describe those capabilities or, in some cases, transferable skills, which will improve outcomes for individual learners and so for wider society.

Perseverance	Self-perception
Self-control	Motivation
Trust	Perseverance
Attentiveness	Self-control
Self-esteem and self-efficacy	Metacognitive strategies
Resilience to adversity	Social competencies
Openness to experience	Resilience and coping
Empathy	Creativity
Humility	

Tolerance of diverse opinions Engaging productively in society	
Heckman & Kautz,	Gutman & Schoon

**Table 1 – Capabilities for success in life**

I have summarised the research into this area in *Learning to be Employable*, suggesting a list of important habits of mind (capabilities) which are important for success in life, Table 2:

<b>Habits of Mind</b>	<b>Transferable Skills</b>
Self-belief	Communication
Self-control	Time-management
Perseverance	Self-management
Resilience	Problem-solving
Curiosity	Team-working
Empathy	Giving and receiving feedback
Creativity	
Craftsmanship	

**Table 2 – Centre for Real-World Learning’s Habits of Mind and Transferable Skills for Employability**

*(c) Pedagogy: at the core of effective education*

The significant omission in the Consultation is any recognition of the importance of pedagogy<sup>4</sup> or teaching and learning methods and the degree to which these are different in different contexts and depending on different desired outcomes. In a general school setting where the context is the classroom there is a well-developed and longstanding literature here, see, for example, Watkins and Mortimore (1999). At HE level, while less long-lived, there is a well-established tradition of research of which Hénard and Roseveare (2012) is a good overview. In HE and FE the issue of older learners needs to be addressed. That’s to say that the maturity and motivation of adult learners are likely to be different from those at school. ‘Andragogy’ (Knowles, 1970) has been the term used for fifty years to mark this distinction.

The missing element to this debate has been a research-led discussion of pedagogy for vocational education of all kinds, something I have investigated at some depth over the last decade (Lucas and Spencer, 2015; Lucas, Spencer and Claxton, 2012).

The following list is indicative of methods which are relatively well-understood in some contexts. The majority are broadly ‘learning by doing’ or ‘experiential’, though many combine reflection, feedback and theory. For each one there is significant research to suggest that it is effective in vocational education:

<sup>4</sup> For a definition of pedagogy see Lucas, Claxton and Spencer (2013) – ‘...the science, art and craft of teaching. Pedagogy also fundamentally includes the decisions which are taken in the creation of the broader learning culture in which the teaching takes place and the values which inform all interactions’

- Learning by watching
- Learning by imitating
- Learning by practising ('trial and error')
- Learning through feedback
- Learning through conversation
- Learning by teaching and helping
- Learning by real-world problem-solving
- Learning through enquiry
- Learning by thinking critically and producing knowledge
- Learning by listening, transcribing and remembering
- Learning by drafting and sketching
- Learning by reflecting
- Learning on the fly
- Learning by being coached
- Learning by competing
- Learning through virtual environments
- Learning through simulation and role play
- Learning through games.

Of course some of these methods will sit well in schools and universities, too. My point is that, the new Commission will need at least to recognise the complexities and subtleties of vocational pedagogy in colleges and work based learning settings as it seeks to take an overview of very different kinds of learning.

The obvious difference between work based learning and that provided by schools and universities is that the setting is primarily a work place not a learning place. As Joe Harkin (2012) reminds us:

*There is no one-size-fits-all approach. There is a strong consensus that effective teaching methods for vocational learning are based on realistic work problems and scenarios, led by teachers and trainers who have recent and relevant vocational experience.*

*(d) Parity of esteem*

In its wish for parity of esteem between sectors the Consultation joins a long list of bodies tasked with bringing this about. But for as long as the emphasis is on structures rather than on what actually goes on – pedagogy - the evidence suggests that this is unlikely to come about.

In *How to teach vocational education* (2012) I argue that the most important requirement is for those delivering vocational education, via apprenticeships, via colleges and in workplaces need to set a much more ambitious set of goals. For the danger is that vocational routes are seen simply as means of developing skills and

expertise for the workplace. I suggest a very broad specification of the kinds of capabilities that should be central to vocational education in the 21<sup>st</sup> century:

1. Routine expertise (being skilful)
2. Resourcefulness (stopping to think to deal with the non-routine)
3. Functional literacies (communication, and the functional skills of literacy, numeracy, and ICT)
4. Craftmanship (vocational sensibility; aspiration to do a good job; pride in a job well done)
5. Business-like attitudes (commercial, entrepreneurial, social)
6. Wider skills (for employability and lifelong learning).

Too often vocational education is defined by the first of these six outcomes and inevitably suffers when compared to 'academic' alternatives at school or university.

Our research into the teaching of vocational education was specifically recognised with regards to issues of parity in the first serious national study of these issues led by Frank Mcloughlin (2013) in the Commission on Adult Vocational Teaching and Learning (CAVTL):

*For too long, the sophisticated and connected process of teaching, training and learning has been undervalued. The Commission therefore agrees with Lucas, Spencer and Claxton (2012) about the importance of codifying, recognising and valuing the sophisticated practice of vocational pedagogy.*

#### *Question 14 – Models for a Quality Assurance Framework*

Any model will need to have resonance for schools, colleges, work based learning settings and universities. The European Quality Cycle<sup>5</sup> offers a useful framework which might be adapted to include a common set of desired outcomes (see page 5) into which each sector could buy?

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<sup>5</sup> <http://www.eqavet.eu/gns/policy-context/european-quality-assurance-reference-framework.aspx>

# THE QUALITY CYCLE

of the European Quality Assurance Reference Framework for Vocational Education and Training

## 1. Purpose and Plan

Set up clear, appropriate and measurable goals and objectives in terms of policies, procedures, tasks and human resources.

## 2. Implementation

Establish procedures to ensure the achievement of goals and objectives (e.g. development of partnerships, involvement of stakeholders, allocation of resources, and organisational or operational procedures).



## 4. Review

Develop procedures in order to achieve the targeted outcomes and/or new objectives; after processing feedback, key stakeholders conduct discussion and analysis in order to devise procedures for change.

## 3. Assessment and Evaluation

Design mechanisms for the evaluation of achievements and outcomes by collecting and processing data in order to make informed assessment.

### QUALITY INDICATORS

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|---|--|---|--|
| <p><b>1. Relevance of quality assurance systems for VET providers</b></p> <ul style="list-style-type: none"> <li>• Share of providers applying internal quality assurance systems defined by law or own models</li> <li>• Share of accredited VET providers</li> </ul> <p><b>2. Investment in training of teachers and trainers</b></p> <ul style="list-style-type: none"> <li>• Share of teachers and trainers participating in further training</li> <li>• Amount of funds invested</li> </ul> <p><b>3. Participation rate in VET programmes</b></p> <ul style="list-style-type: none"> <li>• Number of participants in VET programmes, according to the type of programme and individual criteria</li> </ul> | <p><b>4. Completion rate in VET programmes</b></p> <ul style="list-style-type: none"> <li>• Number of persons having successfully completed/abandoned VET programmes, according to the type of programme and individual criteria</li> </ul> <p><b>5. Placement rate in VET programmes</b></p> <ul style="list-style-type: none"> <li>• Distribution of VET learners at a designated point in time after completion of training, according to the type of programme and individual criteria</li> <li>• Share of employed learners at a designated point in time after completion of training, according to the type of programme and individual criteria</li> </ul> | <p><b>6. Utilization of acquired skills in the workplace</b></p> <ul style="list-style-type: none"> <li>• Information on occupation obtained by individuals after completion of training, according to the type of training and individual criteria</li> <li>• Satisfaction rate of individuals and employers with acquired skills/competences</li> </ul> <p><b>7. Unemployment rate</b></p> <ul style="list-style-type: none"> <li>• According to individual criteria</li> </ul> <p><b>8. Prevalence of vulnerable groups</b></p> <ul style="list-style-type: none"> <li>• Percentage of participants in VET classified as disadvantaged groups in a defined region or catchment area according to age and gender</li> <li>• Success rate of disadvantaged groups according to age and gender</li> </ul> | <p><b>9. Mechanisms to identify training needs in the labour market</b></p> <ul style="list-style-type: none"> <li>• Information on mechanisms set up to identify changing demands at different levels</li> <li>• Evidence of their effectiveness</li> </ul> <p><b>10. Schemes used to promote better access to VET</b></p> <ul style="list-style-type: none"> <li>• Information on existing schemes at different levels</li> <li>• Evidence of their effectiveness</li> </ul> |
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For further information consult: [www.eqavet.eu](http://www.eqavet.eu) and [www.ec.europa.eu](http://www.ec.europa.eu)



### Question 15 – A focus on quality enhancement

There is a good opportunity for engaging directly with the workforce as part of their professional learning in this process and in line with the recently revised professional standards for teachers and those working in FE and WBL. Alignment post 16 will be important and challenging and a framework which enabled teachers and practitioners to engage, formatively with these issues might be useful as the Commission begins its work.

### Question 16 – Apprenticeships and the Commission

It is a telling omission to me that this question sits within a section on financial and governance assurance. My earlier comments on the need for ambitious outcomes and a focus of pedagogies which best deliver these are of critical importance here. If the Commission is to oversee the uptake of more apprentices at level 4 and above, then a far more fundamental consideration of pedagogy for apprenticeship is required.

As with my earlier comments the first stage is to define the outcomes wanted from apprenticeships before rushing into structures and accountabilities. In *Remaking*

*Apprenticeships* (2015) we defined an apprentice in ways which make clear a level of ambition:

*An apprenticeship is a mutually beneficial relationship between a learner and an employer in which an individual, through a blend of on- and off-the-job methods and by working with other more skilled people, becomes competent in a chosen occupation. By competence we include both routine and non-routine expertise. Apprenticeship, in addition, equips potential employees with the habits of mind of someone who has a deep pride in the vocational activity for which they are being formed, while at the same time developing the wider skills they will need for a lifetime of working and learning. While the learning will focus on the demands of contemporary workplaces, it will also unambiguously seek to prepare the apprentice morally and socially for active citizenship.*

Apprentices differ from school, college and university students in that they are primarily employees rather than learners.

Despite the many different kinds and levels of apprenticeships our research has suggested that there are three key features of apprenticeship learning:

1. The fact that they require both *on and off-the-job learning*.
2. Their social context – that they require *learning from and with others* within a community of practice.
3. The requirement for *visibility of learning processes* – as an integral aspect of the first two and as an increasingly acknowledged feature of effective learning wherever it takes place.

These are explored in more detail in *Remaking Apprenticeships*.

There are many issues that could be explored in more detail but three seem most important; a consideration of the amount of time it takes to become really skilled and how not enough time is allowed in higher level apprenticeships; the enormous opportunities of digital learning and the specific complexities of the social partnership between employer, college and work based learning provider in the provision of apprenticeship learning.

#### *Question 22 – Retention and completion*

The higher the quality of the learning the more likelihood of better retention. Sophisticated pedagogy and high-quality teachers and work based learning practitioners are the key.

It is within the context of this debate that UCU offer the following comments.

1.3 You state here that you want consider how the introduction of future qualifications can best support and help realise the ambitions of the new curriculum. UCU contend that if you genuinely want to undertake that work then a bigger and more insightful piece of work needs to be undertaken by Qualifications Wales, namely a consideration of the introduction of 'junior apprenticeships' for pupils who are 'considered to be failing' within the current system of GCSEs. We know that exam boards consider pass and failure rates to maintain the so called 'gold standard.' UCU believes that to label a young child a failure because they 'learn differently' from other children, have less support at home than other children is a failure of the exam structure not of the young learners.

The Welsh government last year rolled out junior apprenticeships across Wales and thus far the outcomes are very positive. The programme does have its problems in terms of engaging dis-enfranchised youngsters who have been failed by the school system. Surely a new qualifications structure, which we can continue to call GCSE if there is evidence of need, must be able to tell the employer what skills, attributes and knowledge the learner has developed as a consequence of the new curriculum. *As Lucas argues (page 5), 'creative thinking' and these types of capabilities are required and valued by OECD countries, then Wales must use these as a way of "aligning the needs of academic and vocational pathways."* *The pedagogy at work in schools is failing some young learners then we must find a pedagogy that works for them and UCU believe that following the logic of Lucas's argument must be the way for Wales to progress. Not only does it reflect the work of Donaldson and the four purposes of the new curriculum- it would appear to be working in FE under the new Junior Apprenticeship scheme.*

*UCU are keen to see a qualifications structure that can reflect the recognition of the journey travelled by the learner, not one that captures a point in time. We accept that there may need to be some type of written exam at sixteen, but in our view these exams must capture certain information. For those who wish to progress to A level academic study, knowledge based exams at 16. For those who wish to enter apprenticeships or are looking to leave school at sixteen to move into work these exams must address the competencies of the learners And the four purposes of the curriculum.*

*UCU would welcome a decision by Qualifications Wales to look at this matter more closely before deciding on the need to maintain a qualification structure which was established to serve the needs of the old curriculum and in our view risks undermining the new curriculum.*

*We understand that for our views to become a reality it would mean learners making a decision about a pathway at the age of 14. It would also require significant independent careers advice to be accessible to all learners in their second year of secondary school. As HEFCW argue in their response to the Economy and Infrastructure committee of the Welsh Assembly " The role of Careers Wales in providing impartial all age information, advice and guidance (IAG) is significant. Expertise within this service provides an opportunity to reach young people in the school setting, focussing on progression from lower to higher level apprenticeships and then Degree Apprenticeships."*

1.7 UCU is strongly opposed to the proposal to 'bolt on' a new qualification "that supports the development and assessment of the wider skills defined in the new curriculum as a part of the qualification offer" (page 6). The new curriculum is fundamentally different to that which went before which focused on knowledge acquisition. The new curriculum, we believe, requires a new exam framework which captures the aptitudes, skills and knowledge of the learner.

Qualifications Wales can't continue to do what it does without significant regard to what is happening in FE and HE in relation to apprenticeship provision and degree apprenticeships. A new qualifications structure needs to tell both FE and HE that the learner has acquired the requisite level in all three areas, not just the knowledge plus a bolt on wider skills qualification. *An argument well-made we believe by Lucas in his response on our behalf to the PCET consultation. Attention also needs to be given to the ensure that acknowledging achievement at levels 1,2 and 3 through teachers assessment and some type of exit exam, maybe a re-structured GCSE exam flows seamlessly into the expectations laid down within the curriculum at levels 4,5, and 7. Which is why UCU argued in the PCET paper for much more attention to be given to pedagogy in this regard.*

2.5 You say in the first bullet that "turning 16 is an important milestone in a young person's life" where in our view the old curriculum failed them, allowing them to leave school without the aptitudes, skills and knowledge to be able to enter the workplace.

The new curriculum is trying to address *this* key failure of the old system, yet the proposals for a new qualifications structure appears to us to want to continue to fail large numbers of learners. *More importantly we believe to do so would undermine the 4 purposes of the new curriculum.*

2.8 The statement in this paragraph makes our point very forcibly, GCSEs account for less than 5% of the total number of qualifications available to learners of this age (16). *The OECD, in our view, is very clear about the future and what our education structures need to be able to deliver for the benefit of society, yet this consultation argues that because the vast majority of learners take GCSE, then they must be the exam of choice. From a UCU perspective, 'Hobson's Choice' is no choice at all. The fact that the knowledge based GCSE exam is the exam of choice is historical and is not what is needed to capture the level of achievement of learners within the four purposes of the new curriculum. We are not opposed to the use of the term GCSE, but the design of the exam must, in our view, reflect the OECD diagram from Education 2013 (page 5).*

3.2 *We note the lack of results data within the consultation document. However* we must accept the fact that the current system produces failures and that is not in the best interests of anyone. The proposals being made in this consultation appear to us to be more of the same. Surely we must have a qualifications structure for young learners which encourages their growth and development in all areas, not just the acquisition of knowledge, as is acknowledged in section 3.10 of your consultation.

**Principle/Proposal One:** Publically funded qualifications taken at 16 should relate to and support the new curriculum for Wales  
Strongly agree- *find narrative from new curriculum doc which supports the development of a single vocational qualification which fits with Welsh apprenticeship framework- published 28 Jan 2020*

**Principle/Proposal Two:** Publically funded qualifications taken at 16 should be available bilingually.

**Strongly agree-** *support the bi-lingual policy but need to be realistic about time frame and ability of staff to deliver in both Welsh and English*

**Proposal/Principle Three:** Publically funded qualifications taken at 16 should form part of an equitable and coherent range that meets the needs of all learners and supports a broad and balanced education.

**Strongly agree-** which therefore must include a vocational qualification which meets the needs of those learners who are currently labelled failures due to their lack of GCSEs.- ref 4.31

**Proposal Four:** Redesigned GCSEs should form a central part of the qualification offer for 16-year old learners in Wales

**Agree-***But the focus of the structure of the exams must be based on the four purposes, capturing the ability to think creatively.*

**Proposal Five:** The qualification offer for 16-year olds should include a specific qualification that supports the development and assessment of the wider skills defined in the new curriculum.

**Strongly disagree-** The whole point of the new curriculum is to locate the soft skills needed for lifelong learning, personal development and work within the new curriculum – not to continue to see it an adjunct to knowledge acquisition.-evidence new curriculum narrative

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