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Re: Qualifications Wales - Consultation on the Advanced Skills Challenge Certificate and Advanced Welsh Baccalaureate

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.

Consultation Question 1

The overarching Advanced Welsh Baccalaureate framework should be discontinued allowing a focus on the Advanced Skills Challenge Certificate as a standalone qualification.

UCU welcomes the proposal to end the overarching framework and its subsequent move towards a compensatory model of assessment. We feel that this better reflects the qualifications focus on graduating skills and agree that the final award should not be made conditional on passing other written examinations.

Regardless of examination performance, too many learners leave education with only a partial record of their strengths. Skills developed in the areas of communication, team work, problem solving and creative thought must also attract accreditation. There is now a body of evidence suggesting that, in addition to knowledge and an ability to perform under pressure, these are the competencies and capabilities which employers and educators value most. Increasing numbers, including PWC, KPMG and EY are developing their own strengths-based assessment processes to recruit. Similarly, the prevalence of 'assessment centre' recruitment

points to the practical importance of complimentary behaviours and what Professor Bill Lucas describes as habits of mind. The challenges posed by a transitional economy determine that those who acquire the equipment to learn, will be best placed to adapt to future changes. Integral skills are thus anticipatory and can move us towards greater social equality and productivity where the conditions for their acquisition is commonly accessible.

For this reason, UCU places great emphasis on the opportunity to re-vision the Advanced Welsh Baccalaureate Certificate. Where we make criticisms, we do so in pursuit of the principles outlined above. It is our feeling that if the qualification can be made to deliver on its initial promise, this will go some way to achieving a learning and assessment experience which is wider than the simple capture of knowledge.

Posing a general question about the wider purpose of this review, the consultation suggests pre-consideration of “the impact of curriculum reform to ensure appropriate progression for learners”. UCU is curious to know how this is possible if the shape of the new GCSE is not yet in place. We suggest that additional evidence and explanation is required. Similarly, at 2.5, no explanation is offered for the decision to start by reviewing the Advanced Certificate and not the National/Foundation Skills Challenge Certificate qualification. We feel that in doing so, this consultation risks the disjoint which accompanies altering the end of a process without fully examining how this will impact its beginning.

Consultation Question 2

The purpose of the new Advanced Skills Challenge Certificate should be to enable learners to develop and apply skills in relevant contexts in preparation for employment, lifelong learning and active citizenship.

UCU broadly supports this purpose but question the assumptions made around its practical implementation. Although we are told that the consultation is the result of an extensive stakeholder review, the evidence used to support some of its recommendations is not always made clear. We feel that greater clarity might enable a more useful conversation about the key things that post-16 settings or employers try to infer from the qualification and how they can be appropriately assessed.

Consultation Question 3

To prepare learners for employment, lifelong learning and active citizenship, the new Advanced Skills Challenge Certificate should require learners to develop and demonstrate their skills in contexts based on the United Nations’ Sustainable Development Goals (SDGs) and Wales’ well-being goals.

UCU acknowledges that prescribing two overarching sources brings advantages both in terms of standardized assessment and core delivery (i.e. common texts and resources, etc). However, whilst applauding the choice to incorporate UNSDG and Future Generations, we feel that this risks introducing a knowledge based approach which undermines the wider purpose of the qualification by narrowing its scope. The central feature of any artefact project is a clear research aim/purpose and sound self-evaluation. The learner must begin with a clear idea of

what it is they want to achieve and how they will measure its success. We fear that by too closely binding the learner's interests to a set of external referents, the space for genuine enthusiasm is reduced. In 2.39, we note that the 'intention' is "for learners to be able to access sources of information more independently as a foundation for developing and applying skills". However, this is communicated as an unsupported ambition with no indication around how it will be achieved.

To put it less generously, it can be read as an attempt to mitigate a didactic framework by directing teachers to teach less didactically. The Donaldson Report (Donaldson) tells us that there should be opportunities for greater depth and creativity within the curriculum. The subsequent reforms are designed to move away from disconnected learning objectives, excessive knowledge focus and a long, prescriptive syllabus. If the new certificate is to build upon this aim then it will be the job of the regulator to establish what standards are measured and not risk determining the curriculum defacto.

Referring to section 2.45, whilst we welcome the principle that "skills should not be over assessed", this does not answer how they will be assessed. Unless the qualification is constructed to require the use of the 4 integral skills, there is a risk that we will end up with a descriptive project. If the aim is to provide something beyond a simple knowledge based qualification then assessments should evaluate actual productions and skills as opposed to the ability to meet a set format. Our view is that this is best achieved by establishing assessment standards which allows for greater flexibility and a learner-centred experience

Consultation Question 4

The structure of the Advanced Skills Challenge Certificate should be revised to include a reduction in components from four to three. The three components included in the new Advanced Skills Challenge Certificate should be:

- Component 1 - Global Community Project**
- Component 2 - Future Destinations Project**
- Component 3 - Individual Project**

UCU enthusiastically welcomes the broadened focus envisaged in the proposed Future Destinations Project. We feel that opportunities to explore aspirations and civic relationships beyond traditional employment add a valuable element around which the integral skills can be demonstrated and developed.

However, UCU harbours reservations around the proposal that learners should no longer be required to be assessed as a part of a team. In referencing OECD research, Donaldson observed; "The ability to function effectively as a member of a team is one of the key skills regularly cited by employers as essential in the modern workplace and is an important feature of the Review's proposals. Cooperative learning is also important in its own right. Hattie's research is unequivocal in concluding that, '...cooperative learning is effective' 56". Subsequent research demonstrates the value which employers and HEI's place on this skill - particularly with respect to STEM subjects such as science, engineering and medicine. Whereas it might be relatively easy for a learner from a wealthier background to evidence these, consideration must be given to those who experience barriers in accessing activities

through which team work can be evidenced. Our concern is that this valuable component is being lost in the effort to make the qualification more compact. Nor are we convinced by the optimistic claim made in 2.410; “this will give them the flexibility to work with others who may not themselves be taking the qualifications, making this element more authentic”. If team activity involves working together to bring different perspectives to a common task, where is that common task or, indeed, common incentive?

Consultation Question 7

The new Advanced Skills Challenge Certificate should require learners to develop and apply their literacy and numeracy skills and their digital competence. These skills should not be learning outcomes in their own right, and learners should not be directly assessed on them.

UCU strongly rejects the proposal that literacy, numeracy and digital skills should be embedded but not assessed. We believe that the whole point of a competencies based qualification is to meld together skills, knowledge and habit of mind. Furthermore, following on from the recent experience of Covid, the suggestion that digital skills are somehow secondary strikes us as deeply misplaced. In referencing 2.73, we are not persuaded by the rationale behind the statement that “embedding these skills, rather than explicitly assessing them, will not disadvantage the learner”. The consultation acknowledges that universities and employers are keen to see these skills but suggests that “where evidence is required...they will look to the range of qualifications that a learner achieves”. The argument here seems to be that, even though these skills have value, because universities fail to perceive it in this qualification, they should not be assessed. Putting aside the proposition that the issue of perception might be addressed through better communication, if we accept that these skills constitute an advantage in their own right, then the advantage to the learner is, by definition, diminished.

In 2015, Donaldson observed “Representatives of business were similarly extremely concerned that schools were out of touch with the emerging digital workplace. They saw the ability to use technology creatively for researching and problem solving as key competences that they wanted to see in prospective employees.” More recently, this point is supported in the ‘Qualifications Wales Importance of Engineering Review’ (2002) where it was found that “The majority of higher education institutions told us that both A levels and vocational qualifications enable learners to progress to higher education. We were told that learners progressing from A-Levels often have a stronger academic background whilst those progressing from vocational qualifications tend to have better practical skills and are better able to solve problems and learn independently.” Accepting that the aim is to deliver a framework which develops practically applied competencies and capabilities, this extract indicates some of what is at risk. Either way, UCU is keen to learn more about the process of stakeholder engagement upon which this decision is based.

Consultation Question 10

Learners should be able to achieve a grade at qualification level without having to pass every component of the new Advanced Skills Challenge Certificate. In the interests of fairness, learners should continue to be entitled to one re-sit per component and the highest grade achieved for that component should count towards the qualification grade.

As mentioned, UCU fully supports the use of a compensatory approach.

Consultation question:

We have identified potentially positive impacts around promoting a more equal and cohesive Wales through our reformed Advanced SCC qualification. Please use the space below to provide feedback on our Equalities Impact Assessment.

In your response, you might want to consider:

- 1. If there are more things that we can do to improve the positive impacts that we have identified in our impact assessment.**
- 2. If there are any other impacts (either positive or negative) on people who have characteristics protected under equalities legislation that we have not identified in our impact assessment.**

The argument we make in relation to equality in question 4 applies to many of our general observations. Ultimately, the Skills Challenge was designed to develop and accredit skills which are not consistently captured in other parts of the curriculum. The fact that it was largely greeted as a 'bolt-on' might very well have tarnished its reputation. However, this does not negate the qualifications valuable purpose. UCU welcomes many aspects of this review, seeing it as an opportunity to revise the certificate in line with the current thinking. Moreover, this enthusiasm is based upon the obvious proposition that a part of its function is to provide learners with a level playing field upon which to develop and demonstrate skills which might otherwise only be available to those who can access placements, networks and structured extra-curricular activities. In the same vein, the proposal that learners will not be assessed on digital literacy (even where this is embedded) suggests that there is no necessity to ensure that they receive access to digital tools.