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**Contribution to:
The Weingarten Review of systems of
monitoring and improving the
effectiveness of post compulsory
education in Wales**

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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.

UCU Wales welcome the Welsh Government proposal to create a single body, to oversee the whole of the Post 16 education sector. We support the vision to create flexible learning pathways that embrace and nurture the diversity of talents and personalities that exist in Wales.

Our vision for the post 16 education sector in Wales, is one where the value of education is recognised in its own right, for the importance of providing opportunities to develop personal skills; not just as a tool for delivering an employer skills agenda measured only by its economic value. There is an urgent need to return the focus of post 16 education to pedagogy. The managerial approach that pervades education at present has, in our opinion, undermined professional expertise and diminished opportunities for quality enhancement, through its focus on quality performance.

Therefore UCU Wales offer the following contribution to the Review of Systems for Monitoring and Improving the Effectiveness of Post-compulsory Education in Wales, as outlined by the Cabinet Secretary for education in her written statement dated 29th September 2017.

1. Consider the ways in which activities and performance of the post compulsory education sector are monitored and evaluated by Welsh Government and its agencies, including Estyn and HEFCW, which discharges that responsibility through arrangements made with the Quality Assurance Agency (QAA).

Before considering the ways in which activities and performance of the post compulsory education sector are monitored and evaluated by Welsh Government and its agencies, we need to take a step back and use this opportunity of change to reassess what it is that Wales needs from the sector. We also need to be clear how this data gathering exercise will translate into practical improvements for Welsh citizens. Only once this has been clarified and agreed, can we begin to focus on the most appropriate ways to monitor and evaluate the functions of the post compulsory education sector.

Outcomes will only ever reflect input; input needs to be designed and delivered to reflect and support, the purpose of the overall aim. If we are not clear about the purpose of the system, we run the risk of evaluating outcomes that are not entirely appropriate; when such outcomes are then used to inform input, they are likely to skew the process away from the original purpose of the system. The result is then revealed in the unintended consequences and behaviour that appear. For example, funding by results has led to the quality of provision being measured by the number of qualifications obtained, but takes little regard of the process which led the 'successful attainment'. This concern appears to be echoed by employers who report that although employees have relevant qualifications, they lack other intellectual and social skills, which would be beneficial to the workplace.

The new PCET body will of course need to ensure that all post 16 providers within its remit, maintain an acceptable quality of education. Our concern is that there is no agreed definition of what it is that constitutes quality in education; without such agreement, we have no basis for deciding what it is that needs to be monitored. This issue is highlighted by the differing quality assurance agencies currently used in the post 16 sector. At this present time, neither Estyn nor QAA oversee post 16 as a whole. We are of the opinion that this cannot continue to be the case moving forward. There needs to be a single agency, with a consistent view of quality education across multiple disciplines, at a post compulsory level. Any such agency must also possess an international perspective of education, to safeguard and improve the quality and reputation of post compulsory education in Wales, worldwide. Staff and assessors should have collective knowledge and experience of quality standards in both Further and Higher Education and of both academic and vocational qualifications. In addition careful thought needs to be given to ensuring synergy across and between academic and vocational pathways, with the provision of a curriculum content framework common to all post 16 providers in Wales. In terms of creating a sector that will promote social cohesion and mobility; and an environment where adults as well as young people, have opportunities to improve their circumstances; there must be such a framework to ensure that the

quality of curriculum content across differing levels and different providers is easily comparable for students, employers and the public. We must avoid a situation where there are as many different curricula as there are providers. We must also ensure that any common framework developed must promote parity of esteem between vocational and academic pathways, in order to broaden educational opportunities for all citizens in Wales.

2. Consider the effectiveness of current arrangements for the monitoring of post-compulsory education in Wales judged by reference to other UK nations, relevant international comparators and research evidence.

It is untenable to continue with two differing systems of quality assurance, within one sector. In terms of clarifying comparable values between post 16 pathways, it would assist parents, pupils, students, post 16 providers and employers, if only one quality assurance agency was responsible for reporting on the sector (including 6th form provision).

Estyn is well suited to schools, as its staff expertise is overwhelmingly from this sector, in addition, the current Donaldson review of Estyn is solely focussed on schools and the new curriculum. The new curriculum has so far been developed to the exclusion of the post 16 sector (with the exception of ITET), so it would seem a good point to allow Estyn to focus its expertise on quality in schools, and for the PCET commission to be allowed to seek an alternative quality assurance agency, with the expertise to focus on post compulsory education, fit for both a national and international arena.

There are aspects of the current QAA system that should be considered in the development of one overall agency for the post 16 sector, such as

- The characteristic statements which describe the distinctive features of a qualification at a particular level.
- The National Credit Frameworks – A useful tool to compare learning achieved in different contexts.
- Partnership between teaching professionals, students and the QAA in developing the Quality Code
- The focus on skills for employability.
- Focus on higher apprenticeships
- Existing partnerships with Further Education colleges

From our perspective we do not differentiate between 'education' and 'training'. Being trained to carry out a specific task requires a level of assimilating and understanding new knowledge; in other words, a level of education. However, we also accept that within this, there is a diversity of interchangeable teaching methods, appropriate to different types and styles of learning and education. Therefore the remit of a post 16 quality assurance agency should also encompass provision in work based learning.

Thus Wales should use the current overhaul of its education system to reconsider quality measures across the post 16 sector, only once a coherent strategy and policy has been agreed.

3. Work with people in the post-compulsory education sector in Wales to consider how current activities and future plans can be aligned with the five principles of the Well-Being of Future Generations Act. The five principles are as follows:

- **look to the long term;**
- **focus on prevention;**
- **deliver an integrated approach to achieving the 7 well-being goals;**
- **work in collaboration with others to find shared sustainable solutions;**
- and**
- **involve diverse populations in decisions that affect them.**

If we are to develop a long term plan, we must take account of the potential for longer and healthier lives. We must also recognise that the concept of a “job for life” is no longer likely to be a reality and therefore lifelong learning must become a necessity. This means that the current compartmentalising of types of education and training based on age, mode and/or level needs to be reconsidered.

Education for life cannot stop at 19 years of age as suggested by current Welsh Government policy; the availability of true life-long learning, as Hazelkorn puts it, is “...a necessity in the 21st century.”

The OECD (2016; p2)¹ model for Education in 2030 indicated the need to think beyond knowledge and skills. There is a tendency to focus on the acquisition of ‘skills’ in the post 16 sector, particularly below level 6. However, as the OECD model expresses, when it comes to education; knowledge, skills and attitudes are intertwined. By taking a more integrated approach such as this and collaborating with other OECD members, Wales could move towards a more holistic approach to learning, suitable for 2030 and beyond. Regardless of whether pathways are considered to be ‘vocational’ or ‘academic’, they require equal complexity of interaction between skills, knowledge and values; they are both, types of education and learning. Vocational education is often viewed a ‘second best’ option, which is often reflected by choices made at the transition from compulsory to post 16 education and through the assumption that vocational choices are for ‘less able’ students. Research by Lucas et al. (2012) suggested that there was insufficient understanding of teaching and learning methods in vocational education. Although there seems to be a gradual and constructive shift from this position, we would welcome meaningful discussion with Welsh Government of the importance of pedagogy in vocational education

¹ <http://www.oecd.org/pisa/aboutpisa/Global-competency-for-an-inclusive-world.pdf>

“The evidence suggests that serious consideration of pedagogy is largely missing in vocational education and....that vocational learners are the losers as a result of this omission.”²

Vocational education is not simply a process of learning skills for a particular type of employment; it should include not just application, but also questioning, reflection, critical thinking, decision making and problem solving; the soft skills required by employers. Therefore, future monitoring and evaluation of the performance and activities of the post 16 education sector should focus on the processes used to achieve an outcome, not just the outcome itself. To be a successful nation, we need to develop more than subject knowledge or learned responses; we need to know how to use what we have learned, we need to reflect upon and adapt that learning, we need to be able to communicate and behave in a variety of ways, depending on a diverse range of cultures and personalities. Such skills will enhance employability, however we need to consider more than simply looking at skills for employment; we need to consider the role of post 16 education in social mobility and the development of an environment where adults can have some control in improving their own circumstances, through their own efforts. We seem to have somehow lost sight of that in the current thinking for post 16 education, in its quest for improved outcomes and satisfying the needs of the employers. As a result we have been left with a system seeking perpetual improvement, with no place for reflection or failure, no room to move sideways or start again; just an upward continuum with no apparent goal.

“Metrics should support, not supplant, expert judgement” Wilsdon 2015 ³

The first step should be to develop appropriate policy for the post 16 sector, inclusive of Further Education, Higher education, Adult Education, WBL and Apprenticeships and with scope to include 6th Form provision, such as that proposed in Ellen Hazelkorn’s ‘Towards 2030’⁴. Until there is a coherent strategy and policy for the whole of the post 16 sector, decisions about what should be monitored and how it should be evaluated, are likely to be of little value.

The formulation of any such policy must involve collaboration with others to find shared sustainable solutions, and involve diverse populations in decisions that affect them. This is crucial if we are to address Hazelkorn’s observation that there is an

“Overall absence of strategic capacity and joined-up thinking at and between government and institutions.”

We would argue that post 16 strategy should not be the responsibility of only government and institutional leaders; there are many other stakeholders who can contribute their expertise to the formation of a new post compulsory

² <https://www.worldskillsuk.org/media/1835/how-to-teach-vocational-education.pdf>

³ http://www.hefce.ac.uk/media/HEFCE,2014/Content/Pubs/Independentresearch/2015/The,Metric,Tide/2015_metric_tide.pdf

⁴ <http://gov.wales/docs/dcells/publications/160310-hazelkorn-report-en.pdf>

education sector. Particularly with regard to institutions, the variety and expertise of the contribution of teaching practitioners is often overlooked, in strategic development.

The debate surrounding the Teaching Excellence Framework (TEF) has included questions around the most appropriate issues to focus on; what metrics it should include and how achievement in teaching excellence should be recognised. However the student perspective of what constitutes teaching excellence remained largely unclear, until the publication of '[Teaching excellence: the student perspective](#)', a research project, jointly commissioned and funded by a consortium of students' unions, on students' views of how teaching excellence should be assessed, measured and recognised. The report states that:

"There is a significant discrepancy between what policy makers believe constitutes excellent teaching and what students think makes excellent teaching."

Students reported that the TEF did not take into account the equipment, facilities, libraries, and IT resources available to them. 86% of students who took part in the survey considered IT facilities rather important or very important to their teaching experience and the percentages are even higher for library resources (93%) and course-specific resources (94%).

Evidence from The Student Perspective of Teaching Excellence also suggested that factors such as graduate employment, destinations or retention data, which are often regarded as measures of quality educational provision, differ from the factors that students believe demonstrate excellence in teaching, such as the teachers, the teaching, the support that they received and the gaining of knowledge and skills. The student survey, put graduate employment at the bottom of the list. Only 34% of students surveyed indicated that universities should be held to account if graduate job ratings were poor and only 18% agreed that universities should be held accountable for student dropout rate.

The UK government policy on [reducing teacher workload](#) (2016) highlighted the impact that excessive reporting, monitoring, evaluating had on teaching and learning." The associated reports emphasised the importance of

"broader professional pedagogical conversations where data is a component part, not a driver, and where trust is returned to practitioners []"

In summary the [project on data management](#) concluded that practitioners should not have to collect meaningless data and that they should be trusted to teach, rather than to collect meaningless data to prove it.

We are aware that Welsh Government is currently carrying out a similar small scale project, but in order to work towards achieving and maintaining the five principles of the Well-Being of Future Generations Act, there must be much more meaningful engagement with teaching professionals and students, as to what constitutes quality in education and how this can be demonstrated.

4. Consider recommendations for the introduction and operation of an annual publicly accessible system for reporting on, monitoring, evaluating and improving post-compulsory education in Wales.

When considering publicly accessible systems for reporting on post-compulsory education, there need be clear definitions of what it is that constitutes the 'measured' object; for example there is no clear definition of 'quality' in education. It can either be represented by the quality of data and data management and the achievement of desirable targets, or it can be represented by less tangible factors such as, personal development and wellbeing. Whichever definition is used, it should be crystal clear to those accessing any reports. The public need to be able to make informed choices, based on well-defined data; data that is consistent across all post 16 providers. However, the paramount consideration prior to publication of any data, should be its purpose and whether the way that the information is presented, fulfils that purpose. All too often, well intended publications result in unhelpful league table comparisons^{5 6} which mask the true value of provision.

Ellen Hazelkorn also noted the

“...absence of coherent learning pathways and educational opportunities for students, of all ages, gender and talent, from school, into/through further and higher education, and especially throughout their working lives”

Therefore when making recommendations for the provision of publicly accessible information, consideration should be made of the ease and opportunity for choice for students and prospective students across the whole of Wales, when monitoring the success of policy and identifying gaps, as opposed to the comparison of individual institutions. We need to move towards a system that results in a useful resource for people of all ages and abilities, at transition points throughout their lives and encourages co-operation; not one that increases isolation and self-interest.

5. Consider how the post-compulsory education sector in Wales continues to ensure high quality outcomes for students within a sector that is internationally successful for innovation and research.

First we need to make sure that researchers employed within institutions are given secure contract of employment with appropriate remuneration for contribution of their expertise.

We also need to ensure that lecturer workload is manageable and allows time for experimentation, reflection and peer review.

⁵ http://www.hepi.ac.uk/wp-content/uploads/2016/12/Hepi_International-university-rankings-For-good-or-for-ill-REPORT-89-10_12_16_Screen.pdf

⁶ <https://www.scidev.net/global/education/opinion/the-problem-with-university-rankings.html>

We must give our teaching staff the flexibility to use and develop their professional skills, in an environment of trust and appreciation. We must develop a culture of supporting our teaching professionals, through the promotion of quality enhancement. We must stop pretending that the relentless scrutiny of arbitrary targets, is what defines quality in teaching – it does not.

6. To consider whether there may be a need for legislation and new or reformed institutional arrangements to take forward future arrangements proposed in the light of this review.

We are concerned that waiting for legislation is wasting valuable time. There is much that could be done, in the way of strategic planning, by adapting arrangements that are already in place. HEFCW for example, with its current expertise, is well placed to begin the process of transformation, in preparation for necessary legislation at a later date.

7. Comment on how the current systems for monitoring and evaluating post-compulsory education can be aligned with the Well-Being of the Future Generations Act (2015) goals and the development of a post-compulsory education strategy in-keeping with the Welsh Government's response to the Hazelkorn Report. The seven well-being goals are as follows:

- **a prosperous Wales;**
- **a resilient Wales;**
- **a healthier Wales;**
- **a more equal Wales;**
- **a Wales of cohesive communities;**
- **a Wales of vibrant culture and thriving Welsh language; and**
- **a globally responsible Wales**

Why is it appropriate to consider only current systems for monitoring and evaluating post-compulsory education? Current systems, however well intended, have often led to creating unintended outcomes for the sector. As previously stated, we perhaps need to take a step back and re-evaluate the purpose of our post compulsory sector, in order to formulate a clear policy direction. Once this is achieved we will have a clearer idea about what is important to monitor and what is not.

With regard to the seven well-being goals, UCU Wales are clear that in order for any of these to be achieved, we must develop a post compulsory education system that acknowledges and supports the importance of lifelong learning, that does not discriminate on grounds of age, ability, mode or level of study and previous qualifications.

We trust that our contribution to the review will be taken into consideration and would be please to meet to discuss our views further.