

Children, Young People and Education Committee

Meeting Venue:

Committee Room 1 – Senedd

Meeting date:

Thursday, 22 January 2015

Meeting time:

09.15

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



For further information please contact:

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Committee Clerk

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Agenda

Private Pre-meeting (09.15 – 09.30)

1 Introductions, apologies and substitutions (09.30)

2 Qualifications Wales Bill – Evidence session 4 (09.30 – 10.30) (Pages 1 – 33)

Universities Wales and ColegauCymru

CYPE(4)-02-15 – Paper 1

CYPE(4)-02-15 – Paper 2

Professor John Grattan, Chair of the Universities Wales Learning and Teaching Advisory Group, and Pro Vice Chancellor of Aberystwyth University

Amanda Wilkinson, Director – Universities Wales

Greg Walker, Chief Executive – ColegauCymru

Jim Bennett, Principal – Coleg Gwent

3 Qualifications Wales Bill – Evidence session 5 (10.30 – 12.00) (Pages 34

- 53)

Council for the Curriculum Examinations and Assessment (CCEA), Oxford Cambridge and RSA Examinations (OCR) and Edexcel (Pearson)

CYPE(4)-02-15 - Paper 3

CYPE(4)-02-15 - Paper 4

CYPE(4)-02-15 - Paper 5

Justin Edwards, Chief Executive - CCEA

Anne-Marie Duffy, Director of Qualifications - CCEA

Paul McGlade, National Manager Ireland and Wales - OCR

Derek Richardson, Director - Qualifications Development & Assessment for Pearson Qualification Services - Edexcel

4 Papers to note (12.00)

Letter from Professor Dame Sue Bailey - CAMHS in Wales (Pages 54 - 55)

CYPE(4)-02-15 - Paper to note 6

Letter from the Chair of the Petitions Committee - P-04-559 Secondary School Awareness of Self-Harm (Pages 56 - 71)

CYPE(4)-02-15 - Paper to note 7

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Sarah Bartlett
Deputy Clerk
Children, Young People and Education Committee
National Assembly for Wales
Cardiff Bay
Cardiff CF99 1NA

12 January 2014

Dear Ms Bartlett,

Qualifications Wales Bill: evidence session with Universities Wales, 22 January 2015

Thank you for the opportunity to provide evidence on the Qualifications Wales Bill to the Children, Young People and Education Committee on 22 January 2015. In advance of the session we wish to submit our outline views on the Bill, which we hope will be of assistance to you.

Universities Wales is the representative body for universities in Wales and its governing council comprises the vice chancellors of Welsh Universities and the Director of the Open University in Wales. The former Chair of Universities Wales and Vice Chancellor of Bangor University, Professor John Hughes, was a member of the 14-19 Education Review. Professor April McMahon, Vice Chancellor of Aberystwyth University, is a member of the Qualifications Wales Advisory Board on behalf of the university sector.

Universities Wales would make the following points to be considered in establishing Qualifications Wales through the proposed Bill:

Establishment of Qualifications Wales

1. We are supportive of the establishment of a single body (Qualifications Wales) which is responsible for the regulation and quality assurance of all non-degree level qualifications in Wales. We understand that there will also be scope over vocational qualifications, but that the debate over apprenticeships continues to be discussed. In our response to last year's Welsh Government consultation on proposals to establish a new body, we were keen that the current division between the regulatory function of Qualifications Wales and its delivery function could be addressed over time.

2. In order to be successful, we concur with the view that Qualifications Wales will need to work in partnership with a range of stakeholders and other organisations. In addition to core provider interests, such organisations include those responsible for careers advice, employers, and universities. Universities Wales understands that the Qualifications Wales Board will not include representation from specific groups, including higher education, but rather will seek individuals with corporate expertise (financial, legal etc). It is absolutely vital that universities are represented appropriately on the Qualifications Wales Board, and it is deeply concerning that universities will not have sufficient representation under the current proposals. Universities Wales urges a rethink on this, to ensure that the higher education voice is heard.
3. In establishing any new body there will be a range of unforeseen consequences, including in this case, the impact on rigidity or fluidity of the curriculum or how existing examination providers will evolve. The real and perceived value of the new body will be important. The new body should prioritise and facilitate the learner journey, raise standards and provide a clear focus on high level achievements.
4. Universities Wales is keen that the new body is established in a cost efficient manner. There will be costs associated with any new arrangement, however. In this case we should expect expenditure requirements not just for establishment but for stakeholders including the training and development of teachers to deliver new requirements. There will also be significant communication costs if the endeavour is to be a success.

Curriculum

5. We note the potential enhanced role the new body could play in setting curriculum requirements and designating subjects. This could be a contentious area and the consultation requirements associated with these functions will need to be clear. The process for determining 'priority qualifications' is a case in point.
6. Response to Welsh Government consultation overwhelmingly identified a role for universities in providing advice on the A level curriculum (although the benefits of university engagement should not be restricted to A levels). Indeed, universities have an important role to play in developing the A level curriculum and in ensuring that A level content supports progression into higher education. University academics and staff are already extensively engaged in this way and have worked with awarding organisations for many years, for example, in providing advice on higher level vocational qualifications, which feed directly into some university programmes.

7. A levels will need to remain broad enough to prepare students for the next stage of life, whether in higher education, employment or other forms of education. Whilst we believe that A levels are broadly fit for purpose for progression into higher education, we support the creation of a body with responsibility to ensure that they continue to meet their objectives and remain robust, and internationally comparable. This is particularly important in an increasingly competitive global job market, where employers are demanding greater numbers of highly skilled individuals.

Communication

8. We feel that the stated aim of Qualifications Wales in *promoting public confidence in qualifications and in the Welsh qualification system* may be too narrow. The new body will need also to inspire the confidence of employers, universities and other stakeholders not just in Wales but across the UK and internationally. The fundamental importance of qualifications extends beyond the individual to include the benefits of a recognised, highly qualified population in attracting employers.
9. Indeed, the importance of recognition and reputation for high quality, relevant qualifications cannot be overstated. In taking steps to differentiate Welsh qualifications, Qualifications Wales must ensure at least parity recognition with its closest competitors – in reality it should be seeking to go well beyond that.
10. We would therefore like to see greater emphasis in the Bill on the European and international dimension of the engagement Qualifications Wales must undertake. Such engagement will include programmes such as the European Qualifications Framework and NARIC (the agency responsible for providing information, advice and expert opinion on UK qualifications worldwide). Welsh qualifications do not and will not exist in a vacuum, and any new legislation should be responsive enough to take account of those developments outside Wales, and avoid an insular approach.
11. We have been very encouraged by the positive working relationship which has been sought in relation to implementing these proposals which has allowed us to avoid the sorts of damaging debates seen elsewhere. The benefits of communication and engagement from a university perspective include:
 - A greater understanding of the content and delivery of new qualifications and hence the incoming skills and knowledge of students
 - An opportunity to forge relationships with pre-higher education institutions and potential future applicants
 - Opportunities to become involved in delivering new qualifications
 - Alignment of CPD programmes to focus on the skills needed to deliver the new qualifications.

We look forward to meeting the Committee on 22 January to discuss these matters further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Wilkinson', with a stylized flourish at the end.

Amanda Wilkinson
Director, Universities Wales

National Assembly for Wales
Children, Young People and Education Committee
CYPE(4)–02–15 – Paper 2
Qualifications Wales Bill
Evidence from: ColegauCymru

Consultation questions

The Explanatory Memorandum prepared by the Welsh Government describes the Bill's main purposes in the following terms:

The Bill provides for the establishment of Qualifications Wales as the independent regulatory body responsible for the recognition of awarding bodies and the review and approval of non-degree qualifications in Wales. Qualifications Wales will also, along with the Welsh Ministers, be responsible for preparing a list of priority qualifications, designated as such by reason of the significance of the qualification, having regard to the needs of learners and employers in Wales. The intention is, through the establishment of Qualifications Wales, to strengthen the oversight of qualifications and of the qualification system in Wales.

The Bill is intended to address the four main limitations of the current system. These are outlined in the Explanatory Memorandum as:

- there is no single organisation that is dedicated to ensuring the effectiveness of qualifications and the qualification system;
- there are no powers to prioritise qualifications and to thereby focus regulatory activity where it is most needed – with the result that there are large numbers of regulated qualifications but limited resources to ensure effectiveness;
- there are no powers to select a single provider of a given qualification to ensure that learners across Wales take the same qualification; and

- the capacity to drive forward the strategic development of qualifications within the current arrangements is too limited – creating a risk that Wales’ qualifications will not be held in as high esteem, nationally and internationally, as those in other nations.

The Bill provides Qualifications Wales with the following principal aims, and it must act compatibly with these when exercising its functions:

- a) Ensuring that qualifications, and the Welsh qualification system, are effective for meeting the reasonable needs of learners in Wales; and
- b) Promoting public confidence in qualifications and in the Welsh qualification system.

Question 1 – Is there a need for a Bill for the purposes outlined above?

1. ColegauCymru has supported the broad agenda set out in the *Review of Qualifications for 14 to 19-year olds in Wales* (“the Review”) chaired by Huw Evans OBE that reported in November 2012. The recommendation to establish an independent qualifications regulator separate from the Welsh Government was a key recommendation of that report.

2. ColegauCymru contributed constructively to the Review and the extensive follow up work implementing its recommendations.

- In partnership with the Welsh Government, ColegauCymru organised a national consultation conference on qualifications in February 2012 which was addressed by the then-Deputy Minister for Skills, Jeff Cuthbert AM, as well as Professor Alison Wolf of King’s College London, and Huw Evans OBE.
- The report of the Review team in November 2012 reflected many of the main points that ColegauCymru had raised in its submission to the Review in August 2012 (a copy of this submission can be found here: www.collegeswales.ac.uk/download.ashx?r=628).

3. ColegauCymru suggested, in its submission to the Review, that the regulation of qualifications should be exercised independently of day-to-day ministerial control. We argued that this would bolster public confidence in the quality assurance of qualifications for both general and vocational qualifications. We are pleased to see that the Qualifications Wales Bill enshrines this principle clearly. The strategic legal powers assigned to Qualifications Wales would also help enable it to fulfil its challenging role,

were the Bill to be enacted. **ColegauCymru therefore supports the overarching principles of the Bill.**

4. ColegauCymru has continued to play an active role in the development of the new qualifications regime in Wales through membership of the Welsh Government's Stakeholder Reference Group on qualifications reform among other groups. In all of these discussions we seek to place the interests of learners and the economic and social needs of employers first. ColegauCymru is also engaged in project work with the Welsh Government on the implementation of some of the Review's key recommendations.

5. The four limitations of the current system outlined by Welsh Government in its Explanatory Memorandum are well made and accurate. For these specified reasons - and for the sake of perceived independence from operational governmental control - the Bill is a timely and important development for qualifications regulation in Wales. **ColegauCymru supports the key elements of the Bill.**

If you believe there is a need for the Bill, what are the main issues that need to be resolved?

6. While supporting the principles of the Bill, ColegauCymru believes that there is a need for a clearer remit for Qualifications Wales to fulfil the two additional purposes:

- The promotion of a genuine **parity of esteem between academic qualifications and vocational qualifications** within our society. There is still a significant divergence in the cultural and social attitudes to these forms of study and learning outcomes among the media, learners, parents and employers that leads not only to social injustice but also to significant missed economic opportunities for Wales. Wales' future capacity to prosper as an industrial economy and achieve social inclusion will partly depend on us overcoming this disparity of esteem.
- We consider that Qualifications Wales should **ensure that our qualifications fully aligned and comparable with the European Qualifications Framework (EQF)**. This is a key issue for Wales as many people wishing to work or study in the European Union (EU) will benefit from qualifications that are properly recognised in other parts of Europe. One of the four strategic objectives of Education and Training 2020 (ET2020 – the European Commission's strategic framework for European cooperation in education and training) is to 'make lifelong learning and mobility a reality' therefore the portability of qualifications across Europe will continue to be an important issue if this objective is to be realised by the member states of the EU.

As Wales' National Coordination Point for the EQF, for the European

Credit System for Vocational Education and Training (ECVET) and for European Quality Assurance in Vocational Education and Training (EQAVET), ColegauCymru offers its support to Qualifications Wales in this particular area of work.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	<input checked="" type="checkbox"/>
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	
Question 2 – Do you think the Bill, as drafted, delivers the stated objectives as set out in the Explanatory Memorandum?	
7. Yes, we judge that it does generally. However, the caveats outlined above in response to Question 1 should be addressed through specific amendments to the Bill, as we suggest below.	
If not, how do you think the Bill should be amended to take account of this?	
8. ColegauCymru believes that that the two purposes mentioned in our response to Question 1 should be reflected in specific amendments which add subclauses (i) and (j) at section 3 subsection 2. These subclauses should state that Qualifications Wales should also:	
<ul style="list-style-type: none"> (i) promote the parity of esteem between academic and vocational qualifications and (ii) promote the compatibility of qualifications in Wales with the relevant European credit and qualifications frameworks. 	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	<input checked="" type="checkbox"/>
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	
Question 3 – Are the sections of the Bill as drafted appropriate to bring about the purposes described above?	

<p>9. Whilst we would not wish to make a technical judgement on the quality of the legal drafting of the Bill, our initial reading is that the clauses of the Bill generally enable the discharge of the Bill's purposes.</p>	
<p>If not, what changes do you believe need to be made to the Bill?</p>	
<p>10. We have no further comment on Question 3.</p>	
<p>How significant is this issue? (Please select one option)</p>	
<p><i>1 - This is a key, urgent problem.</i></p>	
<p><i>2 - This is a problem that needs to be addressed.</i></p>	
<p><i>3 - This is a minor problem</i></p>	
<p><i>4 - Not a problem.</i></p>	<input checked="" type="checkbox"/>
<p>Question 4 – Has the Welsh Government correctly identified the four main limitations of the current arrangement, and will the two principal aims the Bill sets for Qualifications Wales, as well as the eight matters which it must have regard when exercising its functions, effectively address these limitations?</p>	
<p>11. Since the inception of the Review of Qualifications, ColegauCymru's position has been that qualifications regulation should, in principle, be exercised at arms length from direct Ministerial control. This is not listed in the four main limitations of the current arrangements and so we would argue that the lack of an arms length approach in the current system is, in effect, a fifth limitation to the current arrangements.</p> <p>12. As for the eight matters to which Qualifications Wales must have regard, we have already stated above in relation to Questions 2 that amendments should be tabled to the Bill to reflect the matters that we have raised in response to Question 1.</p>	
<p>If you believe there are problems in this area, how do you think they could be resolved?</p>	
<p>13. The Bill itself, by establishing an arms length arrangement for qualifications regulation in Wales, addresses this point.</p>	

How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	<input checked="" type="checkbox"/>
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	
Question 5 – What are your views on the proposals for determining ‘priority qualifications’ and, within these, ‘restricted priority qualifications’?	
14. The proposals as outlined seem both reasonable and proportionate to the function concerned. An additional regulatory focus on key qualifications seems to be a sensible and prudent. We would expect that both general and vocational qualifications would be considered to be priority qualifications in this regard.	
If you think there are problems in this area, how do you think they could be resolved?	
15. At this stage it is difficult to foresee specific problems in the exercise of this particular regulatory function.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	<input checked="" type="checkbox"/>
Question 6 – What are your views on the commissioning type process Qualifications Wales would undertake under the Bill, in respect of restricted priority qualifications?	
16. The commissioning of qualifications is an important function for Qualifications Wales that ColegauCymru supports. Powers in this regard are enshrined into the clauses of the Bill. This function could help address situations where there is market failure for qualifications in situations where Wales has particular economic, educational, social or linguistic needs not currently addressed by awarding bodies.	

If you believe there are problems in this area, how do you think they could be resolved?	
17. At this stage it is difficult to foresee specific problems in the exercise of this particular role for Qualifications Wales. ColegauCymru does not have a general concern about this function for Qualifications Wales, as outlined in the Bill.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	<input checked="" type="checkbox"/>
Question 7 – How will the Bill change what organisations do currently and what impact will such changes have, if any?	
18. At this stage it is difficult to speculate usefully on the Bill’s concrete impact on specific organisations. It is obvious that awarding bodies will be among those organisations that will be most directly affected if the Bill becomes an Act in anything like its current form. We note one challenge in response to the relationship between the Welsh Government’s on-going policy making functions and Qualifications Wales’ responsibilities below.	
If you believe there are problems in this area, how do you think they could be resolved?	
19. The policy formulation role of the Welsh Government in relation to the broad education curriculum and Qualifications Wales’ role in relation to the qualifications (that accredit the learning outcomes of that curriculum) will have to be coordinated appropriately. This will require a fully worked out modus operandi between the Welsh Government and Qualifications Wales.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	

<i>3 - This is a minor problem</i>	<input checked="" type="checkbox"/>
<i>4 - Not a problem.</i>	
Question 8 – What are the potential barriers to implementing the provisions of the Bill (if any) and does the Bill take account of them?	
<p>20. Some of the key potential barriers to the successful implementation of the Bill include:</p> <ul style="list-style-type: none"> • The financial constraints on Qualifications Wales once it is established (if the Bill is enacted) • The responsiveness of awarding bodies to the new regulatory regime in Wales • The establishment of a successful modus operandi between the curriculum-setting policy function of the Welsh Government and the qualifications regulations functions of Qualifications Wales. 	
If you believe there are problems in this area, how do you think they could be resolved?	
<p>21. Successful implementation of the Bill will require a ‘Team Wales’ approach focussed on fulfilling the interests of learners and the social and economic needs of employers. Colleges, and ColegauCymru itself, will play a constructive part in this ‘Team Wales’ approach to making the new system a success when/if the Bill is enacted.</p>	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	<input checked="" type="checkbox"/>
Question 9 – Do you have any views on the way in which the Bill falls within the legislative competence of the National Assembly for Wales?	
<p>22. We note the assurance of the Welsh Government that the Bill is within the legislative competence of the National Assembly.</p>	
Question 10 – What are your views on powers in the Bill for Welsh Ministers to make subordinate legislation (i.e. statutory instruments,	

including regulations, orders and directions)?

In answering this question, you may wish to consider Section 5 of the Explanatory Memorandum, which contains a table summarising the powers delegated to Welsh Ministers in the Bill to make orders and regulations, etc.

23. The proposed use of the affirmative resolution procedure for the various regulations that will flow from the Bill when/if it becomes an Act is appropriate given the intention of the Bill to suitably distance qualifications regulation from operational Ministerial control.

Question 11 – What are your views on the financial implications of the Bill?

In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Regulatory Impact Assessment), which estimates the costs and benefits of implementation of the Bill.

24. In the current climate of general reductions in public spending all proposals to increase the net cost of public service functions must be subject to rigorous scrutiny and challenge.

25. All of the viable options (Option 1b to Option 3) presented in the Explanatory Memorandum require some additional public expenditure, which is to be expected given the additional regulatory functions to be undertaken. We also note that the additional monies required to fund these functions would, in all likelihood, be taken from other elements of the education and skills budget in Wales - including the actual delivery of programmes of learning (leading to qualifications) by education and skills providers. It is concerning therefore that the annual operating costs for option 3 (the preferred option) is around £2.8m-£3m more than that of Option 1b.

26. We would therefore request that the projected running costs of Qualifications Wales is subject to a further rigorous benchmarking review by officials and the Wales Audit Office prior to any budget being agreed by the Welsh Government for the new body. Every publicly funded body in Wales has to demonstrate that its operations are as lean, efficient and economical as possible in the fiscal circumstances we face.

Question 12 – Are there any other comments you wish to make about specific sections of the Bill?

27. There are no further points that we wish to make. We are happy for this submission to the committee to be placed in the public domain.

Agenda Item 3

National Assembly for Wales

Children, Young People and Education Committee

CYPE(4)-02-15 – Paper 3

Qualifications Wales Bill

Evidence from: Council for the Curriculum Examinations and Assessment (CCEA)

Consultation questions

The Explanatory Memorandum prepared by the Welsh Government describes the Bill's main purposes in the following terms:

The Bill provides for the establishment of Qualifications Wales as the independent regulatory body responsible for the recognition of awarding bodies and the review and approval of non-degree qualifications in Wales. Qualifications Wales will also, along with the Welsh Ministers, be responsible for preparing a list of priority qualifications, designated as such by reason of the significance of the qualification, having regard to the needs of learners and employers in Wales. The intention is, through the establishment of Qualifications Wales, to strengthen the oversight of qualifications and of the qualification system in Wales.

The Bill is intended to address the four main limitations of the current system. These are outlined in the Explanatory Memorandum as:

- there is no single organisation that is dedicated to ensuring the effectiveness of qualifications and the qualification system;
- there are no powers to prioritise qualifications and to thereby focus regulatory activity where it is most needed – with the result that there are large numbers of regulated qualifications but limited resources to ensure effectiveness;
- there are no powers to select a single provider of a given

qualification to ensure that learners across Wales take the same qualification; and

- the capacity to drive forward the strategic development of qualifications within the current arrangements is too limited – creating a risk that Wales’ qualifications will not be held in as high esteem, nationally and internationally, as those in other nations.

The Bill provides Qualifications Wales with the following principal aims, and it must act compatibly with these when exercising its functions:

- a) Ensuring that qualifications, and the Welsh qualification system, are effective for meeting the reasonable needs of learners in Wales; and
- b) Promoting public confidence in qualifications and in the Welsh qualification system.

Question 1 – Is there a need for a Bill for the purposes outlined above?

Section 3 of the Exploratory memorandum notes the heavy influence of requirements in England on Welsh qualifications policy, with the needs of Welsh learners coming secondary to the requirements of English policy (para 3). It also notes concerns regarding the differences there can be across qualifications of similar titles within a competitive or open market structure. The Bill provides for the establishment of Qualification Wales to allow independent regulation and quality assurance of all non-degree level qualifications in Wales. This will allow for the design, development and approval of qualifications which have a specific Wales focus and/or which meet the needs of Welsh learners. The Bill will establish an independent body, accountable to the Welsh Assembly, with responsibility for ensuring that the qualifications system in Wales is fit for purpose.

If you believe there is a need for the Bill, what are the main issues

that need to be resolved?

The Bill covers the main areas to be resolved in terms of the need to ensure that the Welsh qualification system meets the need of learners for Wales. It is important that the proposed ongoing review relating to the consideration of future awarding body aspects of Qualifications Wales (recommended by the Huw Evans Review) continues to be addressed and is not lost once Qualifications Wales begins to operate in what will be a very busy environment. It is also important to clarify the roles of Qualifications Wales, Welsh Government and Awarding Organisations and how the effective discharge of roles will operate. Linked to this in the interim is the need for clarity to be established as to the commissioning model to be used by Qualifications Wales.

How significant is this issue? (Please select one option)

<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	✓
<i>4 - Not a problem.</i>	

Question 2 – Do you think the Bill, as drafted, delivers the stated objectives as set out in the Explanatory Memorandum?

The Bill will support the independence, simplification and strengthening of regulation (para 193 Explanatory memorandum) by removing this role from Welsh ministers and setting up an independent body for this purpose. In our experience this will instil public confidence in the independence of the function.

The further parts of the Bill regarding the list of Priority qualifications and possible designation of Restricted Priority qualifications will meet the objectives set out in para 31 of the Explanatory notes, i.e. to avoid inconsistency between different forms of a given qualification and allow Qualifications Wales to exercise choice between Awarding Organisations. This will enable Qualifications Wales to make

decisions as to the number of qualifications that can be approved for offer in Wales, simplifying the qualifications offer which during the Review and subsequent qualifications was viewed as over complicated. It will also give powers to select a single provider if it is felt that all learners across Wales should take the same qualification, again an area viewed as a limitation of the current system.

If not, how do you think the Bill should be amended to take account of this?

No further suggestions.

How significant is this issue? (Please select one option)

<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	✓

Question 3 – Are the sections of the Bill as drafted appropriate to bring about the purposes described above?

The proposed powers to be given to Qualifications Wales and the activities that they will be required to carry out, as drafted in the Bill, will allow Qualifications Wales to work towards meeting the two principal aims as outlined above.

If not, what changes do you believe need to be made to the Bill?

No changes proposed.

How significant is this issue? (Please select one option)

<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	✓

Question 4 – Has the Welsh Government correctly identified the four main limitations of the current arrangement, and will the two principal aims the Bill sets for Qualifications Wales, as well as the eight matters which it must have regard when exercising its functions, effectively address these limitations?

The limitations identified follow on from the regulatory and qualifications market recommendations in the Review and outline areas where change is needed to allow the recommendations as a whole to be further acted upon. Further recommendations relating to the operation of Qualifications Wales in terms of awarding are noted as being for action in future legislation. It seems appropriate to establish the regulatory parameters initially whilst work is ongoing in other areas which may impact upon the future operation of Qualifications Wales in terms of aspects of for example awarding

The two principal aims and the eight matters should address the limitations outlined.

The aims give Qualifications Wales responsibility for the effectiveness of qualifications and the qualifications system in Wales, as well as promoting public confidence in both. It addresses the lack of a single dedicated organisation and reduces the risk of Wales' qualifications being held in lower esteem.

Limitations two and three are not directly addressed by the aims and matters identified but the details of the work Qualifications Wales will be asked to carry out in terms of the list of priority qualifications and restricted priority qualifications do address these areas. The overall aim of ensuring the Welsh qualification system is effective in meeting the needs of learners allows for a wide range of activities that could be undertaken to address all limitations.

Likewise, the eight matters do not directly address the limitations stated. However if, in performing its functions, Qualifications Wales pays regard to the economy, stakeholders, comparability, relevance, value for money, it will be in line with the second principal aim of the Bill and ultimately will address issues related to the current

limitations identified in the system.	
If you believe there are problems in this area, how do you think they could be resolved?	
No problems noted.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	
<i>4 - Not a problem.</i>	✓
Question 5 – What are your views on the proposals for determining ‘priority qualifications’ and, within these, ‘restricted priority qualifications’?	
<p>It is an opportunity to streamline the complicated qualifications offer currently in place, allowing clearer options when choosing qualifications and will give public confidence that whatever qualifications are chosen, they will meet the reasonable needs of learners in Wales and the needs of Further and Higher Education, employers and the economy. It will also address the concerns regarding inconsistency across qualifications with the same title and could help ensure continuity and coherence within the curriculum.</p> <p>Conversely, however, it will, as required, limit the qualifications offer in Wales and, by linking the priority and restricted priority qualifications to public funding, restrict the qualifications market to fewer versions of key qualifications. This may concern stakeholders who prefer to have a choice of qualifications of the same title on offer and, whilst the intention is not to remove providers from the qualifications market, it will reduce the number of Awarding Organisations offering some qualifications in Wales to meet the stated goal of a single suite of qualifications for Wales. This in turn may reduce the innovation, creativity and relevance of both content and assessment methodology of qualifications and should be</p>	

monitored.

Management of comparability, portability and cross-border currency in the UK and Europe is also noted as important for stakeholders under the new system and Qualifications Wales will need to ensure there is public confidence in the decisions made and a transparency in the data used to make these decisions.

If you think there are problems in this area, how do you think they could be resolved?

Stakeholder involvement throughout the process and stakeholder endorsement will be vital to ensure portability and comparability are managed. If learners in Wales are to have a reduced qualification offer then what is on offer must allow for progression into Further and Higher Education and/or employment within and outside Wales.

How significant is this issue? (Please select one option)

1 - This is a key, urgent problem.

2 - This is a problem that needs to be addressed.

3 - This is a minor problem

✓

4 - Not a problem.

Question 6 – What are your views on the commissioning type process Qualifications Wales would undertake under the Bill, in respect of restricted priority qualifications?

Having notified Awarding Organisations regarding proposals to restrict and taken on board responses, Qualifications Wales could: ask Awarding Organisations for expressions of interest in designing qualifications detailing relevant experience of similar work and how the needs of learners in Wales would be met; request that Awarding Organisations submit qualification proposals for consideration; request that Awarding Organisations submit draft qualifications and sample assessment for consideration with the most suitable being approved for; ask Awarding Organisations to work collaboratively to

design a single restricted priority qualification (although the competitive market place makes this challenging); or select from qualifications already on offer. During any of the processes above, Qualifications Wales could make decisions about which form or forms of qualification it will approve based on the evidence presented. The latter will form a record for any subsequent audit.

Across the current suite of non-degree level, general and vocational qualifications this is a potentially large item of work to be carried out and it will take some time to meet the objectives stated.

Whatever commissioning type process is chosen, a transparent scheme, setting out clear qualification criteria and a procedure for determining/selecting which forms will be approved needs to be devised. Firstly, as this is a competitive process subject to scrutiny and challenge; secondly to instil public confidence; and, thirdly to ensure there has been regard of the eight matters in Part 2, section 3 (2).

Depending on the competition process devised, this could significantly reduce the interest of Awarding Organisations in developing qualifications for Wales – i.e. if the development of qualifications for the competition incurred significant costs, especially if it is a relatively small market or small demand curriculum area.

If you believe there are problems in this area, how do you think they could be resolved?

There remains a lack of clarity as to how the commissioning process will be carried out. The Bill outlines that this process will be carried out and gives Qualifications Wales the power to design how. Therefore, as yet this is to be decided and it will be important that this is carefully considered. This is unlikely to be detail appropriate for inclusion in the Bill and so would not hinder progress in the legislation. However it is a more significant – issue in terms of how the qualifications market in Wales will actually operate once Qualifications Wales is established.

How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	✓
<i>4 - Not a problem.</i>	
Question 7 – How will the Bill change what organisations do currently and what impact will such changes have, if any?	
<p>The Bill will change the current regulatory mechanisms and systems in Wales and this will have an impact on three-country processes and on interaction with Ofqual and CCEA.</p> <p>It will also change the relationships between the Welsh regulator and Awarding Organisations. It is noted in the Bill that the roles and responsibilities of both parties are to be reviewed in light of the establishment of Qualifications Wales and subsequently clarified, as are the inter-relationships.</p> <p>The aim of a single suite of qualifications may limit the number of Awarding Organisations offering qualifications in Wales.</p>	
If you believe there are problems in this area, how do you think they could be resolved?	
The process for development and offer of priority and restricted priority qualifications may need to be clarified as a priority once Qualifications Wales is established.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	✓
<i>4 - Not a problem.</i>	

Question 8 – What are the potential barriers to implementing the provisions of the Bill (if any) and does the Bill take account of them?	
Due to the large number of qualifications currently accredited and on offer, it will be a significant challenge to review all vocational and general qualifications to allow prioritisation in terms of their significance to learners and employers in Wales. For qualifications undergoing revision restricting the number of forms of priority qualifications will make this more manageable but overall this is a challenging provision.	
If you believe there are problems in this area, how do you think they could be resolved?	
Stakeholder involvement in this process will be crucial as will sufficient resourcing for Qualifications Wales.	
How significant is this issue? (Please select one option)	
<i>1 - This is a key, urgent problem.</i>	
<i>2 - This is a problem that needs to be addressed.</i>	
<i>3 - This is a minor problem</i>	✓
<i>4 - Not a problem.</i>	
Question 9 – Do you have any views on the way in which the Bill falls within the legislative competence of the National Assembly for Wales?	
This would appear appropriate.	
Question 10 – What are your views on powers in the Bill for Welsh Ministers to make subordinate legislation (i.e. statutory instruments, including regulations, orders and directions)?	
In answering this question, you may wish to consider Section 5 of the Explanatory Memorandum, which contains a table summarising the powers delegated to Welsh Ministers in the Bill to make orders and regulations, etc.	
This would appear appropriate in the circumstances outlined in the Memorandum.	

Question 11 – What are your views on the financial implications of the Bill?

In answering this question you may wish to consider Part 2 of the Explanatory Memorandum (the Regulatory Impact Assessment), which estimates the costs and benefits of implementation of the Bill.

Passing the Bill and establishing an arm's length regulatory body is the most costly of the options considered. However, it is the only option of the three which enables progress on some of the Review recommendations; addresses the identified limitations of the current system; and meets the aims and objectives stated for the qualification system in Wales.

Question 12 – Are there any other comments you wish to make about specific sections of the Bill?

In light of GCSE English issues in summer 2012, the delineation of roles of Qualifications Wales and Ofqual (in sections 30 and 31) is important to clearly establish who regulates what qualification where, as, whilst differing in structure, general qualifications such as GCSEs and A levels will have the same titles in England and Wales and the same vocational qualifications will be available in both jurisdictions.

Section 41(3) providing for Qualifications Wales to undertake research into any matter connected with qualifications is an important aspect. This will inform all aspects of the work of Qualifications Wales and help instil public confidence in the decisions made in terms of best practice and supporting the future strategic development of qualifications.

National Assembly for Wales

Children, Young People and Education Committee

CYPE(4)–02–15 – Paper 4

Qualifications Wales Bill

Evidence from: Oxford Cambridge and RSA Examinations (OCR)

What we do

1. OCR work with schools, colleges, workplaces and other institutions in the public and private sector. Over 13,000 centres choose the A Levels, GCSEs and vocational qualifications we offer, such as Cambridge Nationals, Cambridge Technicals and Cambridge Progression qualifications. There are approximately 400 active centres in Wales, representing maintained and independent schools and colleges, training providers and employers, offering a range of OCR qualifications.
2. We develop our qualifications in close consultation with teachers, industry leaders and government to ensure they are relevant for learners today and meet requirements set by Office of Qualifications and Examinations Regulation (Ofqual), DfES in Wales and CCEA (Regulators) in Northern Ireland
3. We support providers to deliver our qualifications, ensuring our customers have access to: professional training; support materials; publications; telephone contact with OCR advisors; and online access to guidance via our websites.
4. OCR recognises the Welsh Assembly's intention is to create a qualification system in Wales that is responsive to its own policies and independent from policy decisions taken by the Department for Education in England. This desire to achieve an independent examination system for Wales is wholly a matter for the Assembly and the people of Wales, but we believe there are risks of such a development for learners in Wales and, indeed, in other parts of the UK. The creation of qualifications solely for Wales will result in issues of comparability and transferability, and may potentially limit the variety and breadth of offer available.
5. The Bill will allow for Ministers and Qualifications Wales to produce a list of priority qualifications and the rationale for creating one national body to deliver the 'assessment of the main qualifications in schools' ignores the evidence of the successful operation of established awarding processes to address this issue. There is strong evidence that joint awarding body processes have successfully delivered comparable standards for many years and it is essential that there is transparency about the process that will be in place to ensure that the safety of the awarding process is a comparable standard to the rest of the UK.
6. OCR would argue that the creation of a single exam board will not inherently protect standards over time or between qualifications or address in any way the main causes of grade inflation. Indeed, we believe it would weaken rather than strengthen the capacity of the system to maintain standards.

7. OCR also believe that the creation of a single exam board in Wales risks increasing costs to the tax payer, creating new bureaucracies, and removing incentives for efficiency and innovation.
8. We welcome the decision to provide Qualifications Wales with independence from Welsh Government, and we support a separation of responsibilities between the function of developing and awarding qualifications and the regulation of this activity. As OCR has long argued for these powers to be moved from Welsh government, we are in support of this direction of travel.
9. Qualifications Wales will need to Concentrate upon the delivery of regulation and quality assurance providing the public with evidence of the ability to act as a trusted independent body with powers to ensure the required standards are delivered throughout the system and promote public confidence in qualifications and in the Welsh qualifications system.
10. We would wish to see more attention given on how the emerging difference between GCSEs and GCEs will be managed in a way to protect the long term progression into HE of learners and the portability of qualifications within all parts of the UK and internationally.
11. The different models for GCSE and GCE that will emerge from 2015 onwards suggest that OCR has had to review the range and scope of provision offered to Welsh learners and centres and it will not be possible to deliver qualifications that meets the needs of both the Welsh and English markets in the future. This has been expressed with apparent shock from schools in Wales that are current OCR centres.
12. The loss of competition between awarding bodies will also have a direct impact on choice. The current system offers schools and teachers the ability to choose between a range of options to create a learning programme that fits with the aspirations and interests of their pupils and with the creation of a single body this inevitably will be removed.
13. Qualifications Wales will inherit a monopoly arrangement where WJEC is the single provider of high status, high volume and high risk qualifications and it will need to reassure stakeholders that robust measures will be in place to ensure the monopoly arrangements from WJEC continue to deliver innovation, responsiveness and reliability.

National Assembly for Wales
Children, Young People and Education Committee
CYPE(4)-02-15 – Paper 5
Qualifications Wales Bill
Evidence from: Edexcel (Pearson)

January 2014

Key points from Pearson response to the consultation, with additional evidence

1. Pearson supports the proposal for the establishment of an independent regulator and qualification provider

Pearson fully supports the establishment of an organisation that acts as an independent regulator and qualification provider that will work across the sector to ensure learners have access to the best qualifications available. We believe that competition, when aligned with effective regulation, is the best means of delivering efficient outcomes. In a world of rapid change and constant uncertainty we believe that it is essential to have a vibrant qualifications sector able to react to those changes. Competition can also drive optimal outcomes, in terms of qualification design and implementation.

2. Collaboration with established awarding organisations could be beneficial

It should be acknowledged that the new independent regulator will not have substantial experience of accrediting and quality assuring high-stakes qualifications. In this sense, we would encourage Qualifications Wales to collaborate with awarding organisations on the information it will need to fulfil its statutory functions, particularly regarding the accreditation and gate-keeping of qualifications. This is to minimise unnecessary bureaucracy and inefficiencies whilst ensuring the regulator protects the interest of learners in Wales.

The Welsh Government recently announced that the WJEC would be the sole provider of the new GCSEs in English, Welsh and Mathematics from September 2015, along with other revised GCSEs from September 2016, as well as revised A/AS levels. We would strongly encourage Qualification Wales to work with us on maintaining standards across equivalent qualifications. This will be important when the structure and design of these qualifications are different (for example coupled versus uncoupled AS) and will be extremely challenging where qualifications contain different content and skills.

3. Learners will benefit from qualifications that are portable

One aspect that must be considered is the need for learners to have qualifications that are portable across borders, both within the UK and beyond. The most common destination for learners to leave (and enter Wales) is England (<http://wales.gov.uk/docs/statistics/2013/130312-migration-statistics-2011-en.pdf>).

With this in mind, it is vital that learners have qualifications that will be understood and valued by all receiving institutions and other stakeholders in Wales and England. Specific examples would include vocational qualifications which confer licence to practise such as childcare and healthcare qualifications. It is important not to disadvantage learners who may seek to work in other destinations in the UK by restricting the use of qualifications to those conferring licence to practise in Wales alone.

4. Minimising disruption and learner choice

The proposals contained within the consultation, and the 14-19 Review of Qualifications, will have a significant impact on the experience of all learners in Wales, particularly those that are 14-19 years old. As the provider of qualifications to many tens of thousands of these learners, Pearson is aware and prepared for the changes that are likely to occur as a result of this consultation. Our primary concern is to our learners and to ensuring that their learning experience is not interrupted or impeded by organisational change outside of their control.

We are fully committed to working with the Welsh Government in meeting its vision and ensuring learners in Wales continue to have access to the highest possible quality qualifications in their education. Pearson invests heavily in providing Welsh language translations of specifications and examinations. For example, our Applied GCEs are translated and we have committed to translating all of our new BTEC NGs in the top sectors in Wales.

Our qualifications – our future
Consultation on proposals to establish a new qualifications
body for Wales
December 2013

Section 3: The case for change

Question 1

Are there any other barriers to the effectiveness of the current system or are there any other weaknesses? Please give your reasons for your answer and comments.

Pearson does not believe that there are any significant further barriers to the effectiveness of the current system beyond those identified in the consultation document.

Question 2

Are there any specific features in the current system that you would like to see retained? Please give your reasons for your answer and comments

We believe that competition, when aligned with effective regulation, is the best means of delivering efficient outcomes. In a world where skills are static or the learning content does not change the main benefit of competition will probably be efficient delivery and innovation. However, in a world of rapid change and constant uncertainty we believe that it is essential to have a vibrant qualifications sector able to react to those changes. Competition can also drive optimal outcomes, in terms of qualification design and implementation.

By contrast a system that is reliant on a single supplier of qualifications is likely to become less responsive to the market and less efficient in delivery. It will also be a single point of failure in the system which can often make quick remedial action more difficult to accomplish.

There is a real danger that Welsh learners will, over time, be disadvantaged in the workplace if their education and training through qualifications is not kept at parity with developments in other parts of the UK

Pearson shares with the Welsh Government the frustration of qualification policy decisions being made in England that have an unnecessary impact on learners in Wales. Any changes that allow for Welsh learners to have a stable qualifications system are to be supported. One aspect that must be considered in the education of these learners is the need for them to have qualifications that are portable across borders, both within the UK and beyond. The most common destination for learners to leave (and enter Wales) is England (<http://wales.gov.uk/docs/statistics/2013/130312-migration-statistics-2011->

en.pdf). With this in mind, it is vital that learners have qualifications that will be understood and valued by all receiving institutions and other stakeholders in Wales and England.

Pearson greatly values the excellent working relationship it has with the Welsh Government on matters of qualification and education policy and looks forward to this continuing.

Section 4: Our vision

Question 3

What are your views on our proposed vision for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson fully supports the establishment of an organisation that acts as an independent regulator and qualification provider that will work across the sector to ensure learners have access to the best qualifications available. Pearson is fully committed to its own continuous improvement and working with stakeholders in Wales to ensure its qualifications are fit for purpose for use in Wales, the UK and beyond.

We would encourage Qualifications Wales to work as collaboratively as possible across the United Kingdom and internationally with other regulators and awarding organisations. Pearson would like to see a regulator that stands up and supports awarding organisations when needed to provide reassurance to learners and other stakeholders on the quality of awarded qualifications.

It should be acknowledged that the new independent regulator will not have substantial experience of accrediting and quality assuring high-stakes qualifications. In this sense, we would encourage Qualifications Wales to collaborate with awarding organisations on the information it will need to fulfil its statutory functions, particularly regarding the accreditation and gate-keeping of qualifications. This is to minimise unnecessary bureaucracy and inefficiencies whilst ensuring the regulator protects the interest of learners in Wales.

The consultation suggests that there will be instances where Qualifications Wales may seek to provide qualifications in competition with Pearson and other awarding organisations. Where this occurs, a transparent qualification development and accreditation process, with published criteria that apply equally to all AOs, including Qualifications Wales, will be vital to the credibility of this process.

Section 5: How we will achieve the vision

Question 4

What are your views on whether these proposed activities and functions will achieve the vision for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson is keen to work with Qualifications Wales to achieve its vision for learners in Wales. In this capacity we already work, and will continue to do so, work with a range of stakeholders across Wales in the delivery of our qualifications.

Currently, we believe there is a need for further information on paragraph 5.9 in the consultation document regarding the future qualification provision of Qualifications Wales and other awarding organisations. This is to allow us, centres and learners to be confident in the provision that can be offered in the short, medium and long-term. Awarding organisations are already developing qualifications for September 2015 and 2016 and, to ensure we meet the needs of Qualifications Wales, we need a concrete understanding of what provision we will be able to offer.

It would be helpful to have more information on the quality assurance requirements and their possible criteria that are detailed in 5.1 - 5.13. It is currently unclear when these will be applied and how the benefit of the quality assurance will be measured. Pearson welcomes the scrutiny and reassurance that regulatory approval brings and would be happy to work with Qualifications Wales on how monitoring and other activities can satisfy these proposals.

The proposal in paragraph 5.12 states that qualifications will not be funded solely because they are quality assured by Qualifications Wales; instead funding decisions will be taken by the Welsh Government. Whilst Pearson supports this proposal, it does raise a question as to the future role of DAQW as a database of qualifications in Wales. Currently, DAQW is in the process of becoming a database of qualifications where awarding organisations have applied for funding. As part of developing the proposal in 5.12 further, we would welcome clarification on how future databases of either quality assured, accredited or funded qualifications will function.

Question 5

What are your views on the proposed governance arrangements for Qualifications Wales? Please give your reasons for your answer and comments.

Pearson has no objections to the governance arrangements in their current detail. We welcome the proposal to work in partnership with Qualifications Wales in the provision of qualifications where it can be done in the best interests of learners in Wales. In any possible collaboration it will be vital that qualifications can still be offered to the necessary standard and service that centres can currently expect from awarding organisations. Pearson would be happy to work further with Welsh Government and Qualifications Wales on the proposals as set out in 5.37.

However, further information is required on how the new regulator will be able to effectively make independent and objective decisions when accrediting Qualifications Wales qualifications and those offered by other awarding organisations. This will require transparency to maintain the confidence of those developing and delivering qualifications for learners in Wales. As part of this, it will be vital that qualifications awarded by Qualifications Wales are held to account in the same way as those by other awarding organisations, as detailed in proposal 5.23.

Question 6

What are your views on the proposed scope and functions of Qualifications Wales? Do you think its scope and functions are about right or should it have a different remit? Please give your reasons for your answer and comments.

Pearson fully supports the proposed scope for Qualifications Wales that is set out in **paragraph 5.20. This states that the new regulator will 'set high level design principles for qualifications that allow awarding bodies to deliver in Wales those qualifications that they also offer elsewhere such as in England and Northern Ireland'.**

This aspect of qualification provision is vital to learners in Wales who will, in many cases, be using their qualifications to progress to opportunities outside of Wales. Likewise, it enables learners from outside Wales to progress in education and employment within Wales.

Question 7

What should Qualifications Wales do to strengthen public confidence in qualifications offered in Wales? Please give your reasons for your answer and comments.

Public confidence is a vital component for any educational jurisdiction.

We would encourage Qualifications Wales to use the expertise of organisations such as Pearson to provide support in strengthening public confidence in qualifications awarded to Welsh learners. This will allow the new regulator to broaden the expertise within its regulated portfolio and bring best practice from around the world into the learning environments of Wales.

Pearson has recently announced details of its World Class Qualifications project (<http://uk.pearson.com/world-class-qualifications.html>). This project aims to ensure that Pearson qualifications uphold an internationally benchmarked standard and are demanding, rigorous, inclusive and empowering.

As part of its work on World Class Qualifications, Pearson has developed a suite of Level 1 / 2 vocational IVET qualifications that are now available in Wales. These BTEC Level 2 next generation qualifications **are the successors to Pearson's existing BTEC Level 2 QCF provision.**

More information on these qualifications is available at <http://www.edexcel.com/quals/firsts2012/Pages/default.aspx>. We have worked closely with teachers, learners and a range of other stakeholders to develop these qualifications and ensure they represent the very best progression opportunities for level 2 learners, and a platform from which to build the skills required by employers and Higher Education providers in global markets. The majority of these qualifications will be fully available in Welsh and English.

Question 8

How and to what extent do you feel that these proposals will have an impact on you, your organisation, learners and/or any particular categories of stakeholders? Please give your reasons for your answer and comments.

Clearly the proposals contained with the consultation, and the 14-19 Review of Qualifications, will have a significant impact on the experience of all learners in Wales, particularly those that are 14-19 years old. As the provider of qualifications to many tens of thousands of these learners, Pearson is aware and prepared for the changes that are likely to occur as a result of this consultation. Our primary concern is to our learners and to ensure that their learning experience is not interrupted or impeded by organisational change outside of their control. We are fully committed to working with the Welsh Government in meeting its vision and ensuring that learners in Wales continue to have access to the highest possible quality of qualifications in their education.

Question 9

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.

We do not have any further questions at this point and would only reiterate our desire to work with the Welsh Government and the future Qualifications Wales whenever possible.

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:

ACADEMY OF MEDICAL ROYAL COLLEGES

Agenda Item 4.1

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5 January 2015

Dear Bethan

Thank you for your e-mail regarding my commission from the Health and Social Services Minister.

First, let me clarify my role as there appears to have been some confusion, I am not reviewing CAMHS on behalf of Welsh Government, I have agreed with Welsh Government that I will support and provide external independent advice for CAMHS in Wales. The aim is to ensure long-term sustainability by facilitating the instigation of service change and to embed a cultural and organisational change within CAMHS to make it fit for the future.

Due to my other commitments, I agreed a limited amount of time within Wales to develop this work, it is therefore important that, the focus should be on considering the strategic nature of how specialist CAMHS functions for all conditions. This will include how CAMHS interacts with other mental health services; how it works with wider NHS provision, such as paediatrics; and its interaction with other agencies, working in the field, such as schools counselling. The intention is to have in place pathways so that young people experiencing the range of emotional wellbeing and mental ill health, have their needs met in a timely manner, by the most appropriate body, and with support of specialist CAMHS, when this is required. This work will be in line with the Minister's priorities for prudent healthcare.

Welsh Government has asked I act as an independent, external scrutiny for CAMHS services, rather than having my terms of reference set from the outset. The process has to be driven by CAMHS in Wales and its partners, and I am still in the process of scoping out the issues which will need to be considered by CAMHS and stakeholders. In terms of timelines and consultation, what we are seeking to achieve is a generational shift in current practice, the full impacts of which may not be fully evident for some years. However, Welsh Government has asked that we have some clarity of direction of travel by the end of 2015, depending on what form this takes there will probably be a need for some more formal consultation as this work develops. As you are aware, the process is being formally launched by the Minister at a conference for CAMHS and key stakeholders on 26 February and there will also be a need for less formal discussion and consultation with stakeholders throughout 2015.

I am being aided in my work by Carol Shillabeer, the Chair of the all-Wales CAMHS and Eating Disorder Planning Network and Sian Richards, current Mental Health Strategy Lead for Welsh

Government; so perhaps if the Cross Party Group would like to meet and feed your views into the process, I could ask them to meet with you and gather your evidence to inform the process.

Clearly I will need to keep the Minister informed of progress, which will include the interest of AMs and others. I am, therefore, copying this correspondence to his policy lead.

With best wishes

Yours sincerely



Professor Dame Sue Bailey
Chair

Cc Jason Pollard
Cc Sian Richards
Cc Carol Shillabeer

Agenda Item 4.2

Y Pwyllgor Deisebau
Petitions Committee



Cynulliad National
Cenedlaethol Assembly for
Cymru Wales

Ann Jones AM
Chair of the Children, Young People and
Education Committee
Ty Hywel
National Assembly for Wales
Cardiff Bay
CF99 1NA

Bae Caerdydd / Cardiff Bay
Caerdydd / Cardiff
CF99 1NA

Our ref: P-04-559

December 2014

Dear

The Petitions Committee has been considering the following petition from Eleanor Price, which has collected 12 Signatures.

Petition Title – P 04-559 Secondary School Awareness of Self-Harm

We call on the National Assembly for Wales to urge the Welsh Government to put in place more educational programmes (specifically in Secondary Schools) to counteract many people's misunderstanding of self-harm. A growing issue amongst teenagers in Wales, 43% of people know somebody who has self-harmed according to a BBC survey. In the same survey, it was reported that 41% think that self-harm is selfish.

Additional Information: Due to the sheer volume of occurrences in self-harm among teenagers in Wales, I feel that there should be more awareness and approachability of the subject. Why should a teenager suffer in silence? This is why I believe that as a country we should provide more substantial resources for a sufferer to find free assistance in battling self-harm.

At the Committee's meeting on 11 November, Members considered correspondence from the Minister for Education and Skills and a variety of responses from the Local Health Boards, all outlining their views on the petition.

Bae Caerdydd / Cardiff Bay
Caerdydd / Cardiff
CF99 1NA

Ffôn / Tel: 029 2089 8421

E-bost / Email: E-bost / Email: Petition@Cymru.gov.uk / Petition@wales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg / We welcome correspondence in both English and Welsh

We agreed to forward you all the correspondence received on the petition so far, to enable you to consider it as part of any future deliberations you may undertake on the work of CAMHS.

Additionally, we are agreed to draw the responses to the attention of Professor Graham Donaldson in light of the work he is currently undertaking on the review of the national curriculum and assessment arrangements in Wales

Please forward any response to the Clerking Team at Petition@Wales.gov.uk.
Yours sincerely



William Powell AC / AM
Cadeirydd / Chair

Enclosures:

Correspondence from the Minister for Education and Skills dated 6 August 2014;
Correspondence from Hywel Dda Health Board dated 16 August 2014;
Correspondence from Cardiff and Vale Health Board dated 31 July 2014;
Correspondence from Betsi Cadwaladr University Health Board dated 29 August 2014;
Correspondence from Aneurin Bevan University Health Board dated 1 September 2014;
Correspondence from Powys Teaching Health Board dated 10 September 2014; and
Correspondence from the Petitioner to the Clerking Team dated 30 October 2014.

P-04-559 Secondary School Awareness of Self-Harm – Correspondence from the Petitioner to the Clerking Team, 31.10.14.

Dear Kayleigh,

Thank you for the opportunity to further comment upon this petition.

Within other comments, it is noted by Mr Bob Hudson that www.kooth.com "operates 24 hours a day", however it should be noted that throughout a day, queues on this site are enormous and many young people are left waiting for hours before receiving the chance to talk to a counsellor within specified time limits.

Mr Huw Lewis also states that "As part of the school curriculum in Wales, personal and social education (PSE) prepares learners to be personally and socially effective by providing learning experiences in which they can develop and apply skills, explore personal attitudes and values, and acquire appropriate knowledge and understanding." This is truthful, however this education is not effective if not enrolled successfully within schools, with some schools opting out of providing this service to save time to prepare for examinations. This is sensible however can result in a lack of understanding of important issues such as self-harm. This is why more emphasis should be made on PSE lessons and teachers should be more adequately informed on how to teach these specific lessons.

In conclusion to increase acknowledgement and awareness of self-harm altogether would see the requirement of organisations to partake in activities with young people to boost understanding. The effectiveness of these activities would be dependant on how many schools these were enrolled in.

Kind regards,

Eleanor Price

Mel Evans, Chairman

Cadeirydd

Bob Hudson, Chief Executive

Y Prif Weithredwr

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mel.evans2@wales.nhs.uk

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GIG
CYMRU
NHS
WALES

Bwrdd Iechyd
Addysgu Powys
Powys Teaching
Health Board

Ref: BH/SA/sj
Your ref: P-04-559

10th September 2014

Mr William Powell, AM
National Assembly for Wales,
Cardiff Bay,
Cardiff,
CF99 1NA

Dear Mr Powell

Re Petition Title: Secondary School Awareness of Self Harm

Thank you for the opportunity to comment on the above petition.

The Welsh national strategy for suicide prevention and self harm reduction "Talk to Me" details a number of actions to be taken forward by organisations across Wales, including health boards, local authorities, schools and third sector organisations. This includes actions to address the issue of self-harm amongst young people. These actions, if implemented, will help to address the issues raised in the petition.

Local Health Boards and Local Authorities are required to respond to local population health needs and prioritise resources accordingly. As such, we believe that local areas should be able to allocate resources to this subject based on local need.

We have summarised below the actions that are already taking within existing resources in Powys, as we recognise the importance of addressing the issue of self harm and reducing associated stigma.

Suicide prevention and self harm reduction have been incorporated in the Powys Mental Health strategy and action plan "Hearts and Minds".

The Powys Children and Young People's Partnership has an Emotional and Mental Wellbeing subgroup, which enables partnership working to address issues including self harm.

Pencadlys y Bwrdd Iechyd
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Health Board Headquarters
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Rydym yn croesawu gohebiaeth Gymraeg
Bwrdd Iechyd Addysgu Powys yw enw gweithred Bwrdd Iechyd Lleol
Addysgu Powys



Pack Page 59

We welcome correspondence in Welsh
Powys Teaching Health Board is the operational name of
Powys Teaching Local Health Board

We have Child and Adolescent Mental Health Services (CAMHS) Primary Mental Health Workers in place across Powys. Working with all our secondary schools, they help teachers to support the mental health of children and to act as the link between schools and the CAMHS service. The Primary Mental Health Workers are seen in Powys as being pivotal to promoting good emotional health amongst young people, helping to prevent mental health issues and identifying potential mental health problems.

The Primary Mental Health Workers also work closely with the youth forum and are part of our cohort of workers who are able to deliver the Youth Mental Health First Aid course to those who work directly with children and young people.

In addition, we have the school counselling service present in all our secondary schools via face-to-face sessions with trained and accredited counsellors and our online service Kooth (www.kooth.com). Kooth provides a free online counselling support and advice service to young people across Powys. This service is anonymous, confidential and operates 24 hours a day, providing direct access to counsellors through messaging and chat room facilities. This ensures that our young people have equal access to services and are not disadvantaged by living in rural areas.


Mental health and emotional wellbeing is a core subject that is addressed through the Healthy Schools Scheme. This is achieved through various actions such as ensuring appropriate policies and strategies are in place that address issues such as bullying and sexual orientation and through activities that are inclusive and promote increased self esteem and well being.

Outside of the school setting, the Youth Intervention Service provides support to young people aged 11 – 19 years with a range of issues including confidence and self esteem.

Powys teaching Health Board has identified improving childhood resilience as one of the priority areas within the Primary Prevention workstream of its Integrated Medium Term Plan 2014-17.

Further information regarding the services available within Powys can be obtained from Clare Lines, Strategic lead for Mental Health, clare.lines@wales.nhs.uk or Sophia Bird, lead for mental health promotion, Sophia.bird@wales.nhs.uk.

Yours sincerely



Bob Hudson
Chief Executive



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Aneurin Bevan
University Health Board

Our Ref: JP/RB/jr
Your Ref:

Direct Line: 01633 435905

1st September 2014

William Powell AC/AM
Chair
Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Powell

Petition Titles: Provision of IDB Services in Wales (Ref: P-04-560) and Secondary School Awareness of Self-Harm (Ref: P-04-559)

Thank you for your letters dated July 2014 and 21st August 2014 respectively, in relation to the above petitions. I noted from both petitions that they posed the same question, but that the first had attracted 664 signatures and the second had 12 signatures. Therefore, given that the wording was exactly the same for both petitions, I have taken the opportunity to provide a combined response to the two petitions. I should be grateful if you would find below a response from Aneurin Bevan University Health Board.

Within the Health Board's Specialist Child and Adolescent Mental Health Services (CAMHS), we have seen a significant increase in the number of deliberate self-harm assessments within our acute hospitals. In 2011 we completed approx 60 assessments, this increased to 125 in 2012 (a change in the age threshold contributed to this), and in 2013 we had 230 assessments. In the current year, our first 4 months activity is just under 90 assessments, therefore, we can forecast that there will be in excess of 250 deliberate self-harm assessments conducted on under 18s within the acute hospitals across the Health Board during this year.

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Bwrdd Iechyd Prifysgol Aneurin Bevan yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Aneurin Bevan
Aneurin Bevan University Health Board is the operational name of Aneurin Bevan University Local Health Board

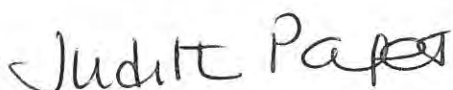
Of course this is only those young people who present to our emergency departments, therefore, we are not fully aware of the scale of the problem in our wider communities. To our senior clinicians working in CAMHS, however, self harm appears to be becoming part of the norm for struggling adolescents with a range of emotional difficulties. The Health Board believes that the subject of self harm is not well understood and young people engage in self harm for so many different reasons. Therefore, the increasing incidence of self-harm in young people has also been strongly noted within our services.

The population that carries the highest incidence of self harm are those young people in secondary schools and therefore it is our view that the petition request to target secondary schools by increasing the number of educational programs is entirely appropriate. Both pupils and staff would benefit from such an approach. Recently the organisation 'MindfullUK' (www.mindfull.org.uk) petitioned for mental health to be included as part of the national curriculum in schools. There can be no doubt that this approach would have a positive impact on the understanding of young people and ultimately would mean less referrals to mental health services as the capacity of schools to support young people more effectively would also increase through this proposed initiative.

It is important to state that there is already a Department of Health initiative available to the whole UK in relation to increasing the understanding of adults (those who work in any capacity with children and young people) of mental health issues. The web resource available at www.minded.org.uk was launched in March this year and was fully supported by a range of professionals and third sector organisations including all the main Royal Colleges in health care. There are nearly 200 modules of online training and these include those on suicide and self harm. The Health Board would therefore suggest that this is something that could be utilised effectively in training programmes and would come at no cost to the user. The Schools Assistance Programme (SAP) is a model that has provided help to schools on a number of issues, including self-harm, that has been delivered in many parts of Gwent as well as elsewhere in South Wales. This model might offer an alternative means of supporting the capacity of schools to appropriately manage issues such as self-harm.

I hope this information is helpful to you. Should you require any additional information, please do not hesitate to contact me or Richard Bevan, Board Secretary on 01495 435938 or via richard.bevan@wales.nhs.uk

Yours sincerely



Judith Paget
Interim Chief Executive/Prif Weithredwr Dros Dro

Response from BCUHB Emotional Health and Wellbeing Service Board to the Petition re Secondary School Awareness of Self Harm

29th August 2014

Petition Title: Secondary School Awareness of Self-Harm

The Petitions Committee has received the following petition from Eleanor Price which collected 12 signatures:

Petition Wording:

We call on the National Assembly for Wales to urge the Welsh Government to put in place more educational programmes (specifically in Secondary Schools) to counteract many peoples misunderstanding of self-harm.

A growing issue amongst teenagers in Wales, 43% of people know somebody who has self-harmed according to a BBC survey. In the same survey, it was reported that 41% think that self-harm is selfish.

Additional Information: Due to the sheer volume of occurrences in self-harm among teenagers in Wales, I feel that there should be more awareness and approachability of the subject. Why should a teenager suffer in silence? This is why I believe that as a country we should provide more substantial resources for a sufferer to find free assistance in battling self-harm.

The Committee considered the petition for the first time at the meeting on 17 June and would be very grateful for your views on this matter.

Response

We very much welcome that this important issue has been highlighted at a national level, and thank you for seeking our views. A summary of the current situation in North Wales, our goals and current work plan is provided below. If any further information is required, please do not hesitate to contact us.

Current situation in North Wales

Young people who harm themselves currently get a very varied response from schools and other front line community services across North Wales. This can range from little or no response at all to immediate urgent referral to local specialist Child and Adolescent Mental Health Services (CAMHS), regardless of need. In addition, and of equal concern, in some areas, universal services hold cases that have not previously met criteria for specialist CAMHS and some of those professionals report being relatively unsupported in this task.

There is a high level of variation in the level of knowledge skill and confidence in knowing how to respond to concerns about self harm and expression of suicidal thoughts in schools and other multi-agency front line services. In response to national drivers, there has been a steady increase in the number of (largely uncoordinated) training courses in self harm and suicidal behaviour in recent years. These have been and continue to be provided by health, social care and third sector agencies, targeting front line staff, including teachers and other school based staff who work with children, young people and families. These courses are mainly one-offs, are often delivered by trainers who do not know the local service context, and mainly focus on increasing awareness and early recognition with advice to respond kindly and with compassion, and to refer all presentations on to specialist services.

For children and young people, there continues to be on-going high referral rates of self harming behaviour into specialist CAMHS in the context of what appears to be a national increase in self harming behaviours. Referral on is not always the right response for the young person, and nor is it a sustainable response in light of growing numbers and finite resources at specialist levels.

In response to our growing concern about the levels of self harming behaviour in young people, in October 2013, the Emotional Health and Wellbeing Service Board supported a proposal that specialist CAMHS services offer an informed and systematic North Wales approach to addressing the needs of children and young people at risk of suicide or self-harm who are identified in schools and other front line services. This approach needs to ensure that children young people and front line professionals gain appropriate and timely help, and that children and young people are assessed and referred into specialist services appropriately where needed.

Why do we need a more consistent approach?

- To improve the quality of support, advice and guidance offered to young people who self-harm, or who may be at risk of committing suicide
- To offer consistent support to children and young people no matter what the point of contact, and to standardise the response of agencies regardless of which agency
- To increase knowledge, skills and competence of staff in non-specialist services to recognise and respond appropriately when working with a young person who self-harms.

Service Delivery Context

Part 1 of the Mental Health Measure came into force 1st October 2012 – specialist CAMHS Single Point of Access arrangements are now in place in each county across North Wales. Plans are currently being made to ‘launch’ the new access arrangements in each county. All specialist CAMHS teams across North Wales are working hard to introduce new ways of working, which requires a shift in emphasis from routinely assessing all cases referred – which frequently and repeatedly leads to lengthy waits – to carrying out initial discussion and consultation to determine needs. Care is then ‘matched’ to presenting need through a range of possible modes of intervention:

- Advice and information and where necessary, training
- Signposting to alternative services or activities in the community
- Working alongside a professional through consultation where this is appropriate to the needs of the young person (sometimes this will be with the professional who refers, sometimes it will be alongside another professional)
- Access to universal or targeted evidence based intervention in the community
- Comprehensive mental health assessment.

Background

Prior to the introduction of the Mental Health Measure, Primary Mental Health practitioners in each county largely led the delivery of specialist CAMHS led training to front line staff on self harm as required under old AQF targets. In some counties,

this has also included the availability of regular consultation with specialist CAMHS practitioners. Where consultation has been consistently available, pathways have been agreed with the Local Safeguarding Children's Board, which has led to a well received system of universal awareness training combined with targeted skills training, the goal of which is to equip selected school based and other front line staff to carry out rapid early first stage risk assessment in close collaboration with specialist CAMHS in order to determine next steps. Regular (once a term) meetings for multi-agency staff who have received skills training are also organised and led by specialist CAMHS to ensure access to appropriate support and information updates for these selected and trained professionals.

This approach adheres to principles from 'Talk to Me' and NICE in establishing sources of help at the first point of contact, quickly assessing risk, and establishing what's needed next. It also ensures that appropriately trained mental health professionals are providing the required level of consultation in collaboration with the professional who first becomes aware of a problem, in order to determine risk. This avoids delays in first stage assessment resulting from joining waiting lists, but ensures that those at highest risk are seen for mental health assessment as quickly as possible.

Connecting with People – Dr Alys-Cole-King

Selected staff from specialist CAMHS have trained as trainers in the Suicide Awareness module. We are currently liaising with Dr Cole-King to adapt the materials for delivery to staff who work with children and young people, as the content is focused on adults. It also focuses on suicide awareness only. We will be including self harm as well as suicide awareness into one jointly agreed module for school and other front line professionals – partly because there is considerable overlap in the messages contained in both awareness level trainings, and also because it is not realistic to expect school staff to attend two separate training courses on this subject. Once complete this jointly developed training module will form the first level of awareness training in the regional pathway of training offered to schools and other front line professionals.

What will a Specialist CAMHS training and consultation pathway look like?

1. Standardised locally delivered awareness-level training in self harm and suicide, available on a regular basis for any multi-agency front line professionals including schools
2. Standardised locally delivered skills-level training, including first stage basic risk assessment questions, available for selected multi-agency front line staff who will be linked to specialist CAMHS through each Single Point of Access. These people will be the first point of contact when self harm comes to light in the community. These trained staff will link directly in to specialist CAMHS and receive help in managing the situation, and will together carry out immediate first level risk assessment, and agree best next steps
 - Professional consultation outcome for those identified as low risk
 - Mental Health Assessment outcome for those identified as high risk
3. Regular (e.g. once a term) on-going multi-agency meetings to keep those trained in first stage risk assessment updated, connected with each other and to specialist CAMHS.

Where are we up to?

- Unanimous support for the development and delivery of the pathway at Emotional Health and Wellbeing Service Board 31st October 2013
- Work with the Local Safeguarding Children's Board is underway to ensure that the community components of the pathway are incorporated into the review of the regional protocol for managing young people who self harm
- Close liaison with Dr Alys Cole-King is underway and the jointly agreed adapted materials for the Suicide [and Self Harm] Awareness module for use with professionals working with young people are nearing completion
- Early stage plans are in place for implementation in four of the six counties across North Wales – close links are in place with local specialist CAMHS management structures to ensure that there is support for the delivery of the community pathway in each county – once this has been ratified with the regional multi-agency LSCB plans will be made to visit local multi-agency planning groups including where possible Secondary Heads Federation Meetings to agree local implementation
- Liaison will be maintained with the newly formed North Wales Talk to Me 2 regional 'network' to review it's terms of reference and aims and objectives – attendance will depend on the goals of the group.

Relevant additional Information



talktomee%5b1%5d
.pdf



T4MH delivery
plan.pdf

Talk to Me Action Plan 2009-2014

Together for Mental Health Delivery Plan 2012-2016

Links to NICE Clinical Guideline 16 (2004) <http://guidance.nice.org.uk/CG16> and NICE Quality Standards 34 (2013)

<http://www.nice.org.uk/guidance/index.jsp?action=byID&o=14200>



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Ein cyf/Our ref: AC-bt-07-3894
Welsh Health Telephone Network:
Direct Line/Llinell uniongychol: 02920 745681

Adam Cairns
Chief Executive

31st July 2014

Mr William PowellAC/AM
Cadeirydd/Chair
Petitions Committee
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Response to be sent to Stephen.George@wales.gov.uk

Dear William,

Re: Provision of IBD Services in Wales

Thank you for the opportunity to comment on the petition relating to more educational programmes in school for young people who self-harm. This is indeed a growing problem amongst our young people and we are working with other agencies in Cardiff and the Vale of Glamorgan to try and understand and address the issue.

The Health Board has established a partnership group which aims to improve outcomes for Emotional and Mental Wellbeing in Children and Young People and I understand that within the schools in our catchment area there is a significant amount of multiagency work being undertaken. This includes projects such as; a National Behaviour & Attendance Review (NBAR) project which supports early identification and monitoring of emotional and social wellbeing; other school based interventions including Emotional Learning Support Assistants; the Healthy Schools scheme which actively encourages schools to adopt a whole school approach to mental and emotional wellbeing.

Our partners in education locally have identified that the biggest issue of concern for schools is the growing incidence in self-harm, and they have established a working group which includes members of the Public Health team and Primary Mental Health Services, to develop training for teachers and parents and agree how this can be implemented. One option being discussed is online training through school websites.

We also have services such as Primary Mental Health where schools can refer young people for support and programmes, such as Families First which supports families

I hope this is helpful, in answering some of your queries.





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University Health Board

Ein cyf/Our ref:	TO	Swyddfeydd Corfforaethol, Adeilad Ystwyth
Eich cyf/Your ref:	P-04-559	Hafan Derwen, Parc Dewi Sant,
Gofynnwch am/Please ask for:	Teresa Owen	Heol Ffynnon Job
Rhif Ffôn /Telephone:	01267 239729	Caerfyrddin, Sir Gaerfyrddin, SA31 3BB
Ffacs/Facsimile:		Corporate Offices, Ystwyth Building
E-bost/E-mail:	teresa.owen@wales.nhs.uk	Hafan Derwen, St Davids Park, Job's Well Road, Carmarthen, Carmarthenshire, SA31 3BB

William Powell AC/AM
Chair
Petitions Committee
Cardiff Bay
Cardiff
CF99 1NA

Dear Mr Powell

Petition Title: Secondary School Awareness of Self Harm

Thank you for your letter to Mrs Karen Howell, Interim Chief Executive, dated July 2014, regarding the petition "Secondary School Awareness of Self Harm".

On behalf of Hywel Dda University Health Board, here is our response:

There are a number of services available to support young people as well as a formal approach to their GP. All secondary schools have a named school nurse and local authorities provide a School Counselling Service. In addition all schools have Pupil Support Officers. All these services provide support for a wide range of student concerns many of which are associated with self harming behaviours.

Although these resources are available they can only help where young people in distress acknowledge their issue and seek help.

The Healthy School Initiative as well as supporting pupils and teaching staff to adopt healthy lifestyle approaches such as good nutrition and exercise also provides a range of materials and training to enable school communities to engage in open discussion about difficult issues such as self harm. The intention is to give teachers and pupils the confidence to recognise and offer support to friends and pupils in distress who find it difficult to seek help themselves.

Self harm is not an easy area to tackle and can lead to individuals being stigmatised by their peers. It is often the result of low self esteem which itself will make it difficult for an individual to seek help. Recently a DVD "Get the Low Down" has been produced by our Child and Adolescent Mental Health Service that provides material to help generate the discussion. Training for teachers to be able to use this material is essential and is underway in some schools which will add to the

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Cadeirydd / Chairman
Mrs Bernardine Rees OBE

Prif Weithredwr /Chief Executive
Mrs Karen Howell

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Hywel Dda University Health Board is the operational name of Hywel Dda University Local Health Board

Mae Bwrdd Iechyd Prifysgol Hywel Dda yn amgylchedd di-fwg Hywel Dda University Health Board operates a smoke free environment



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resources available to tackle self harm.

Yours Sincerely

Teresa Owen
Director Public Health



Eich cyf/Your ref P-04-559
Ein cyf/Our ref HL/01610/14

William Powell AM
Chair Petitions Committee

committeebusiness@Wales.gsi.gov.uk

6 August 2014

Dear William

Thank you for your letter dated 23 July informing me of Eleanor Price's petition on the subject of increasing the number of education programmes regarding self harm in Welsh secondary schools.

As part of the school curriculum in Wales, personal and social education (PSE) prepares learners to be personally and socially effective by providing learning experiences in which they can develop and apply skills, explore personal attitudes and values, and acquire appropriate knowledge and understanding.

The PSE framework for 7 to 19-year-olds in Wales sets out the aim to provide the foundation for a broad, balanced holistic approach to PSE which features a range of experiences to promote the personal and social development and well-being of learners. This framework is the key document that schools should use in planning their personal and social education programme. A copy of this framework can be found from the attached link below:

<http://learning.wales.gov.uk/resources/personal-and-social-education/?skip=1&lang=en>

The five key themes identified in the PSE framework are: Active Citizenship; Health and Emotional Well-being; Moral and Spiritual Development; Preparing for Lifelong Learning; and Sustainable Development and Global Citizenship.

Through the Health and Emotional Well-being theme, learners can be helped to maintain their emotional and physical health, sustain their growth and development, and know how to keep themselves safe. Learners are given opportunities to understand the short and longer term consequences when making decisions about personal health and how to access professional health advice and personal support with confidence.

The delivery of the curriculum is delegated to schools and decisions on the precise content, materials and resources of a school's PSE programme rests with head teachers and their governing bodies, to ensure that it meets the needs of children and their local community.

As part of their work for the Welsh Network of Healthy School Schemes (WNHSS), schools will be looking at all aspects of mental and emotional health and well-being. They will identify areas of concern in their school, and may choose to develop a programme to deal with the issue. Although self harm is not specifically mentioned in the WNHSS guidance, this does not preclude schools from dealing with this issue.

In March, I announced the appointment of Professor Graham Donaldson to lead a wide ranging, independent review of the national curriculum and assessment arrangements in Wales, which includes PSE.

The full terms of reference for Professor Donaldson's review are available from the link below:

<http://wales.gov.uk/topics/educationandskills/schoolshome/curriculuminwales/curriculum-for-wales/terms-of-reference/?lang=en>.

Listening is at the heart of Professor Donaldson's review, and I will forward a copy of your letter to him. If you would like further information on the review please contact: CurriculumReview@Wales.gsi.gov.uk

I hope that this information demonstrates that the Welsh Government is committed to working with secondary schools to develop programmes, policies and guidance aimed at tackling the issue of self harm in secondary schools.

Yours sincerely



Huw Lewis AC / AM
Y Gweinidog Addysg a Sgiliau
Minister for Education and Skills