

# Stakeholder involvement and influence in the reform of vocational qualifications in Wales

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# Abstract

Vocational qualifications (VQs) – which are expected to serve a range of interests and priorities – are a deeply contested area of education policy and have been the subject of repeated reforms across the UK over the past 40 years. VQs are widely taken by learners across Wales but traditionally most of these qualifications have been developed to meet the needs of the English system. It was not until the establishment of Qualifications Wales in 2015 and their programme of sector reviews that Wales begun to depart from its nearest and most powerful neighbour by developing Wales-only VQs in the Health and Social Care and Childcare (HSCC) and Construction and the Built Environment (CBE) sectors.

This study explores the extent of stakeholder involvement and influence in the reform of VQs in Wales, focusing on the HSCC and CBE sectors. It considers how and why some stakeholders were more influential while others were marginalised or excluded and the impact this had on the reform process. A comparative case study approach is adopted, involving interviews with a range of actors during 2021, including representatives from Qualifications Wales, Welsh Government, sector bodies, employers, learning providers, and trade unions. These participants were involved in the reforms and/or are key actors in the vocational education and training (VET) system in Wales.

The study identifies the varied stakeholder relations and competing interests that exist in the VET system in Wales and the uneven levels of involvement and influence observed in both reforms. It draws attention to the absence of, or weakness in, the networks, mechanisms and arrangements necessary for stakeholders to have a voice in relatively inclusive ways. The study points to the legacy of past policies and the turmoil of policy churn and institutional change as key explanations for the uneven levels of participation.

The study offers a series of recommendations to strengthen policy and practice and inform future VQ reforms undertaken by Qualifications Wales, as well as advancing the academic field of policy development on stakeholder involvement.

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# Abbreviations

ACCAC	Qualifications, Curriculum and Assessment Authority for Wales
ВАСН	British Association of Construction Heads
C&Q	Curriculum and Quality Group
CBE	Construction and the Built Environment
CBI	Confederation of British Industry
Cedefop	European Centre for the Development of Vocational Training
CITB	Construction Industry Training Board
CVET	Continuing Vocational Education and Training
ECA	Electrical Contractors' Association
ELWa	Education and Learning Wales
FE	Further education
GCSE	General Certificate of Secondary Education
HE	Higher education
HEIW	Health Education and Improvement Wales
HSCC	Health and Social Care and Childcare
IVET	Initial Vocational Education and Training
NQF	National Qualifications Framework
NTFW	National Training Federation for Wales
NVQ	National Vocational Qualification
OECD	The Organisation for Economic Co-operation and Development
QCF	Qualifications and Curriculum Framework
RQ	Research question
SAG	Stakeholder Advisory Group
SCW	Social Care Wales
SME	Small and medium sized enterprises
TURO	Trade Union Representative Organisation
UNESCO	United Nations Educational, Scientific and Cultural Organisation
VET	Vocational education and training
VQ	Vocational qualification
WBL	Work based learning

## **Chapter 1 – Introduction**

### **1.1. Context of the thesis**

Vocational qualifications (VQs), which are associated with the assessment of "knowledge, understanding and/or skills that relate explicitly to the world of work", form an important part of the education and qualifications landscape in Wales (Qualifications Wales 2016b, p.3). They are widely studied by learners in further education (FE), work-based learning (WBL), secondary schools, workplaces and, to an extent, higher education (HE). However, across the UK, VQs have been a deeply contested area of education policy and have been the subject of repeated reforms over the past 40 years (Keep 2015a). The introduction of National Vocational Qualifications (NVQs) in the late 1980s, the now defunct 14-19 Diplomas and contested T Levels in England provide examples of the continual change that has taken place to VQs, particularly since the mid-1980s.

Over past decades, governments and education bodies across the UK have attempted to involve stakeholders<sup>1</sup> such as employers, sector bodies and learning providers, to greater or lesser degrees, in the reform of VQs. A number of commentators argue that stakeholder involvement and engagement is vital for the success of reform programmes. Finlay (1998), for example, stresses that stakeholder involvement is key in the development of vocational education and training (VET) policy whilst others have made similar calls for the involvement and participation of stakeholders in education systems (Retzl and Ernst 2013; Ranson 2018). Although there are challenges in involving stakeholders, it is claimed that it offers several benefits such as increased commitment in the implementation of reforms, better outputs that are recognised and valued by stakeholders and lower levels of resistance (OECD 2010; European Training Foundation 2016).

<sup>&</sup>lt;sup>1</sup> Stakeholders are defined as "all groups or individuals who can influence, or are affected by, the organisation's actions" (Finlay 1998, p.6).

Some authors suggest that since devolution successive governments in Wales have attempted to develop a distinct 'Welsh way' to education policy (Rees 2011; Power 2016; Power and Taylor 2021; Evans 2022). Central to this approach has been the social democratic belief that cooperation, partnership and collaboration are the best ways of developing and implementing education policy in Wales (Rees 2011; Power and Taylor 2021). Despite these claims, little is known about the extent to which stakeholders are involved in, and influence, the reform of VQs in Wales. Hence, this thesis explores if/how stakeholders were included/excluded and influenced the process of reforming VQs in Wales.

The study was conducted during a significant period of change for VQs in Wales and societal change more broadly with the outbreak of the COVID-19 pandemic. It follows the establishment of Qualifications Wales as the national qualifications regulator in 2015, their programme of sector reviews (Qualifications Wales 2016b; 2018a) and subsequent development of new VQs in the Health and Social Care and Childcare (HSCC) and Construction and the Built Environment (CBE) sectors in Wales. The HSCC and CBE reforms were selected as the focus of this thesis as they were the first two programmes of VQ reform undertaken by Qualifications Wales 2016b; 2018a; 2022a; 2022b), but the extent of involvement and influence has not yet been researched. As such, it will be shown that important lessons can be learnt from researching these first reform programmes, both in policy terms and as a contribution to what is currently known and understood about these processes.

This thesis addresses an aspect of educational research that tends not to be given the attention it deserves by the extant literature, particularly with regard to Wales. Indeed, there is a scarcity of literature that explores the involvement of stakeholders in the reform of VQs in Wales since education became a devolved policy responsibility in 1999. Before devolution, Phillips (1995) argued that there has been a tendency in the UK literature to avoid the Welsh agenda. The pre-devolution literature that had Wales

within its scope often covered both England and Wales, treating the VET systems in both countries as one unified system and assuming that what happens in England also applies to Wales (for example, Manpower Services Commission and Department for Education and Science 1986; Steinmann 1998).

Most of the UK literature since devolution that has explored stakeholder involvement in qualification reforms has concentrated on developments in England and has often focussed narrowly on the involvement of employers (for example, Ertl and Hayward 2010; Haynes et al. 2013; Huddleston and Laczik 2018). There is some relevant literature on Wales, but this primarily centres on the wider VET system such as FE and skills policy (James 2019), the role of vocational teachers (Lloyd and Payne 2012a; 2012b) and the quality of vocational FE (James and Unwin 2016). As such, through a study of VQ reforms in Wales, and the exploration of the role(s) of a wider range of stakeholders than is usually the case, this research makes a significant contribution to the existing literature on stakeholder involvement, and questions of inclusion, exclusion and influence.

### **1.2.** Focus of the thesis

The overall aim of this thesis is to explore the *extent of stakeholder involvement and influence in the reform of VQs in Wales*. Specifically, it addresses two stages of the reform process. Firstly, the HSCC and CBE sector reviews are examined with the aim of identifying which stakeholders were included/excluded and influenced the sector review process and the reasons why this was the case. Sector reviews – which are the backbone of Qualifications Wales' VQ strategy (Qualifications Wales 2016a) – are detailed reviews of qualifications and the qualifications system in key employment sectors to identify whether there is a need to develop new VQs for Wales.

Secondly, the development of approval criteria for new VQs in the HSCC and CBE sectors are explored with the aim of analysing patterns of inclusion/exclusion and influence. Approval criteria are regulatory documents developed by Qualifications

Wales that outline the structure, content and assessment of new VQs that awarding bodies must comply with when developing new qualifications. Qualifications Wales (2022a; 2022b) claim to have involved stakeholders in the development of HSCC and CBE approval criteria, but little is known about the extent of this involvement. As such, this thesis will assess whether some stakeholders had greater involvement and influence in the process than others and why this was the case.

To address the overall aim, the following research questions have been developed:

- RQ1. In what ways were stakeholders involved in, and influenced, the sector reviews of VQs in the HSCC and CBE sectors in Wales?
- RQ2. In what ways were stakeholders involved in, and influenced, the process of developing approval criteria for new VQs in the HSCC and CBE sectors in Wales?
- RQ3. What explains any differences in stakeholders' involvement and influence?

This thesis aims to explore the process of reforming VQs through the voices of those who were involved in, and excluded from, the reform process. Interviews with participants that were involved in the reforms under investigation and/or are considered key actors in the VET system in Wales are used to gather data to address the research questions. A strength of a Professional Doctorate student is their ability to link research with practice (Willis et al. 2010). As a senior manager at Qualifications Wales and a Professional Doctorate student, I aim to generate findings and offer recommendations which can be applied in practice and can strengthen future reforms of VQs in Wales, as well as making a broader contribution to the academic literature in the field.

### **1.3.** Structure of the thesis

This thesis is separated into eight chapters. Chapter 2 provides an overview of the policy landscape relating to this study. Firstly, it describes and defines the terms VET and VQs before providing an overview of the VET system in Wales. Secondly, the key developments in VQ policy in Wales since the mid-1980s are explored, including the background to the establishment of Qualifications Wales. Thirdly, the chapter outlines the findings of Qualifications Wales' HSCC and CBE sector reviews and explains the reported reasons why Qualifications Wales embarked on the reform of VQs in the HSCC and CBE sectors.

Chapter 3 reviews the literature on the involvement (and non-involvement) of stakeholders in VQ reforms across the UK over the past 40 years. The chapter begins by framing stakeholder involvement, discussing competing stakeholder interests and exploring how other countries involve stakeholders in vocational reforms. Secondly, the reasons why the Welsh Government is a central actor in the VET system are discussed. Thirdly, literature focussed on the inclusion/exclusion and influence of stakeholders in previous VQ reforms across the UK since the mid-1980s is analysed, with a specific focus on employers, teachers, trade unions and learners.

Chapter 4 outlines the methodology. It describes and justifies the research design including the research sample, methods and the approaches taken to data collection and analysis. It also explains the ethical considerations and data security procedures followed, before reflecting on the strategies used to mitigate the risks of being an 'insider' when conducting this study.

Chapter 5 is the first of two empirical chapters. It presents the research data, and addresses the research questions, relating to the reform of HSCC qualifications. The chapter discusses which stakeholders were included/excluded and influenced the process of reforming HSCC qualifications. Chapter 6 presents the research data relating to the reform of CBE qualifications and explores which stakeholders were

involved in, and held sway, in the reform of CBE qualifications and the reasons why this was the case.

Chapter 7 considers the data presented in Chapters 5 and 6 and discusses the key findings, drawing out the main contributions that emerge from the research in relation to the extant literature. Firstly, the competing stakeholder views and interests observed in the reforms are explored. Secondly, the chapter discusses which stakeholders were included/excluded and had influence in the reform of HSCC and CBE qualifications and offers reasons why some had greater involvement and influence than others. Thirdly, the role of Qualifications Wales is analysed, with a focus on exploring why 'newness' and inexperience of undertaking VQ reforms were reasons to explain the differences in stakeholders' involvement and influence.

Finally, Chapter 8 draws out conclusions and discusses how each research question has been addressed. It outlines the study's contribution to the field and offers recommendations for policy and practice. Further, the chapter concludes by recognising the limitations of the study and offers suggestions for further research.

# **Chapter 2 – The Welsh VET system in context**

### 2.1. Introduction

The role of stakeholders in the reform of VQs in Wales cannot be researched, or discussed, without exploring the VET context. This chapter provides an overview of the main features of the VET system in Wales in relation to the aims of this research. It begins by defining VET and VQs, before providing an overview of the VET system in Wales. The chapter then discusses the key developments in VQs policy in Wales from the mid-1980s, as a period from which major changes in qualification reforms began, through to the reform of HSCC and CBE qualifications that are the focus of this thesis. Particular attention is given to Welsh Government's (2012a) Review of Qualifications for 14–19-year-olds in Wales which led to the establishment of Qualifications Wales. The chapter then outlines the findings of the HSCC and CBE sector reviews undertaken by Qualifications Wales and the reported explanations as to why the reforms were considered necessary.

### 2.2. Defining VET and VQs

The societal standing of VET and VQs is often considered to be low, particularly across the UK, when compared with other areas of education (Billett 2020). This low status stems in part from a perception that VET/VQs are primarily used for learners with few alternative opportunities (for example, those who are unlikely to progress to higher education), who are more likely to come from lower income, racial minority, or immigrant families (Cedefop 2017a; Billett 2020; Videl Rodeiro and Vitello 2021). Vocational pathways are often considered as second-best to academic routes by teachers, parents and learners (Bosch and Charest 2008; Wolf 2011; Videl Rodeiro and Vitello 2021; Welsh Government 2023a). However, VET and VQs cover a broad range of subjects and sectors and are expected to serve a vast range of purposes, institutions and learners which contributes to the challenge of defining and describing the terms. Across the UK, a range of terminology is used to describe what this thesis will term VET. Terminology such as vocational education, vocational and technical education, technical VET, and many more are used across the UK, often interchangeably, depending on the country and context. For example, in Wales, VET remains the terminology of choice whilst in England, over recent years, there has been increased use of the term technical education (Department for Education 2023; Welsh Government 2023a; Ofqual 2024). Similarly, different terminology is used when describing VQs. For example, the term 'VQs'<sup>2</sup> is used in Wales (Qualifications Wales 2016a) whilst in England the terms 'vocational *and* technical qualifications' are now often used (Ofqual 2024).

'Vocational' means many different things to many different people (Anderson 2020) and VET is considered to be the least homogeneous of the educational fields, characterised by its diversity in terms of purposes, institutions, participants and programmes (Billett 2011; Cedefop 2017a). The concept is multidimensional and is often used as a 'catch all' term to include occupational courses and qualifications at a range of levels, vocational programmes and qualifications that are focussed on particular sectors, and pre-vocational programmes intended to develop non-occupationally specific employability skills. These diverse types of VET provision are a way of developing the knowledge and skills needed to progress to both employment and higher levels of education and are, according to Bathmaker (2013), pulled in multiple directions.

VET has often been defined in relation to general or academic education. More than 60 years ago, Williams (1963) argued that VET (or technical education as Williams termed it) was practical, in contrast to academic education which was more theoretical. A similar position was taken by Gonczi (1997), over 30 years later, who described general or academic education as focussed on abstract thought whilst VET was

<sup>&</sup>lt;sup>2</sup> This thesis will use the term VQs throughout when describing qualifications undertaken as part of VET programmes.

focussed on concrete action. Similarly, the United Nations Educational, Scientific and Cultural Organisation (UNESCO 2011) International Standard Classification of Education differentiates between general education as focussed on knowledge and understanding of a subject, and VET (or vocational education as termed by UNESCO) which is concerned with developing the practical skills and competence necessary for employment in a particular occupation or trade.

Others have drawn the link between VET and the world of work by defining VET as a means of preparing young people and adults for employment and the working world whether it be for entry into work or development whilst employed (Clarke and Winch 2007; Lucas et al. 2010; McGrath 2012). For example, the European Centre for the Development of Vocational Training (Cedefop 2014, p.292) define VET as "education and training which aims to equip people with knowledge, know how, skills and/or competencies required in particular occupations or more broadly in the labour market". Yet, even this broad definition is problematic and ignores the use of VET as a means of re-engagement, progression to higher levels of education and training, and the development of life skills.

Providing a definition of VQs, like VET, has not been helped by the categorisation of VQs to mean everything that is not a GCSE or A Level (Newton 2018). In Wales, when collecting data and conducting research, qualifications are categorised by Qualifications Wales as general or vocational with those categorised as vocational being all those that are not GCSEs, AS/A Levels and the Skills Challenge Certificate within the Welsh Baccalaureate (Qualifications Wales 2024). Despite this narrow classification, Qualifications Wales also provides a more specific definition of VQs as those qualifications that "assess knowledge, understanding and/or skills that relate explicitly to the world of work" (Qualifications Wales 2016a, p.3). Moreover, the terms initial vocational education and training (IVET) and continuing vocational education and training (CVET) are also used to differentiate those programmes and VQs that are undertaken by learners in order to enter the labour market (IVET) and those that are

taken throughout working life (CVET) (Cedefop 2023). However, Ravenhill and Woodhouse (2023), in their recent report on the skills system in Wales, concluded that many qualifications do not fit neatly into the IVET or CVET categories.

It is clear that defining VET and VQs is a challenge (Moodie 2002; Wolf 2011; Cedefop 2017a; 2017b). Nevertheless, when discussing VET, VQs and recommending changes to policy and practice, it is important to be clear about the differences in scope and meaning of the terms. For this study, VET is understood to be provision across a range of learning providers (both publicly and privately funded), undertaken by learners of varied ages from teenagers to mature adults, delivered in a range of ways, has a close connection with the world of work (often through apprenticeships), and serves a range of purposes (Clarke and Winch 2007; McGrath 2012; Bathmaker 2013; Fuller 2015). VET is distinct from academic education and usually involves practical education and training alongside the learning of relevant theory. Relatedly, VQs are those qualifications which are offered as part of VET programmes and typically assess the knowledge, understanding and/or skills relating to the world of work.

### 2.3. The VET system in Wales

The VET system in Wales has been shaped by decades of structural, institutional and governance reforms – both before and after parliamentary devolution – and these cannot be dealt with in detail here. Nevertheless, it is important to provide the context that underpins the VQ reforms that are the focus of this thesis. As such, this section provides an overview of the VET system in Wales. It outlines the institutions that offer VET and VQs and introduces the primary actors involved in the VET system that will be further discussed in Chapter 3.

Providing a comprehensive description of the VET system in Wales is not a straightforward task and, compared with the primary, secondary and HE sectors, VET is the least understood of the educational sectors (Ravenhill and Woodhouse 2023). According to Billett (2011), this challenge is not confined to Wales as, globally, there is

no single model that can be applicable to VET. Keep's (2015b) observations on the English VET system are highly relevant to Wales. He argues that there is no overall VET system but, rather, a set of related, yet fragmented and often over-lapping sub systems within which institutions operate. Indeed, amongst the educational fields, the VET sector arguably has the broadest range of actors and institutions that differ greatly in their formation, identity and structure.

The majority of VET and VQs are offered by three different types of providers in Wales: maintained secondary schools, publicly funded FE colleges and WBL providers (some of which are publicly funded departments within FE colleges and others are private businesses). Adult community learning centres, workplaces and, to an extent, HE institutions also offer publicly funded VET and VQs. These institutions differ in the provision they offer, the age of learners they support, the government departments they report to, and the funding systems which underpin their work. These are also represented by a varied range of organisations such as ColegauCymru for FE colleges (including WBL departments within colleges) and the National Training Federation for Wales (NTFW) for private WBL providers.

In terms of scale, there are 182 maintained secondary schools (not including independent schools and special schools), 12 FE colleges, and 10 WBL providers who have Welsh Government contracts across Wales and approximately 100 more sub-contracted WBL providers who work with the main contract holders (Estyn 2022; Welsh Government 2023a). Adult Learning Wales also operates across Wales offering publicly funded VQs in a range of adult community learning centres. According to the Review of VQs in Wales (Welsh Government 2023a), during 2021/22, 81,995 individual learners were studying at least one VQ in Wales with the majority of these learners studying VQs in FE colleges (61%), with 27% in WBL, 9% in secondary schools and 3% in adult community learning. Of those learners, many were studying more than one VQ with over 300,000 certificates for VQs awarded to learners in Wales in 2021/22 (Qualifications Wales 2024).

Alongside providers of VET/VQs, there are a range of other stakeholders – such as awarding bodies (of which there are more than 90 recognised in Wales), employers, sector bodies, trade unions and learners – who are part of the VET system, to a greater or lesser extent. For example, employers have been afforded a prominent role – but with questionable success – in the VET system in Wales (and the wider UK) since the 1980s and there is substantial literature that explores the involvement of employers in VQ reforms across the UK (for example, Raggatt and Williams 1999; Ertl and Hayward 2010; Huddleston and Laczik 2012; 2018). In contrast, workers and trade unions have been marginalised in the VET system and considered merely as passive recipients of vocational reforms rather than active agents in the process (Keep et al. 2010; Rainbird 2012; Keep 2015b; Stuart 2019). The involvement of these stakeholders in vocational reforms will be discussed in more detail in Chapter 3.

A range of government departments and sponsored bodies are responsible for different elements of the VET system (similar observations are made about the governance of the English VET system – see Keep 2015b). For example, responsibility for post-16 VET policy and funding now sits with the newly established Medr whilst VET in schools for 14–16-year-olds remains the responsibility of the Welsh Government. Even at a ministerial level there is fragmentation (and arguably complexity) in terms of responsibilities. Apprenticeships are now the responsibility of the Minister for Culture, Skills and Social Partnership, VET in FE and HE is the responsibility of the Minister for FE and HE, whilst VET in secondary schools remains the responsibility of the Minister for Education (Welsh Government 2024a).

The Welsh Government has delegated a number of its responsibilities relating to education and qualifications to government funded sponsored bodies. For example, Qualifications Wales, Estyn and Medr – like previous bodies such as the Qualifications, Curriculum and Assessment Authority for Wales (ACCAC), the Higher Education Funding Council for Wales, and Education and Learning Wales (ELWa) – are all funded by the Welsh Government and, in the main, report directly to government ministers.

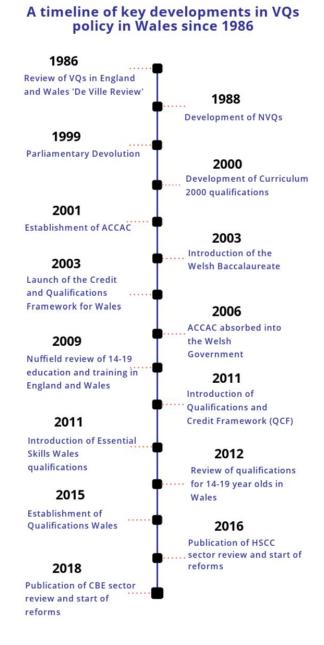
However, as will be discussed in the next section, there has been continual change to the organisations responsible for regulation, policy and funding of VQs and VET since devolution which arguably has created instability in the VET system in Wales.

### 2.4. Key developments in VQs policy in Wales

As shown in Figure 1, there have been numerous changes to VET and VQs in Wales since the De Ville review in 1986 (Manpower Services Commission and Department for Education and Science 1986) most of which have been driven by reforms designed for, and initiated in, England. It was not until devolution in 1999 that Wales was in a position to develop its own education policies. However, over the first 15 years of devolution, apart from the creation of the Skills Challenge Certificate (within the Welsh Baccalaureate) and Essential Skills Wales qualifications, Wales did not diverge significantly from England in terms of the VQs that were offered to learners. Most VQs were offered on a three-country basis with the majority developed for the English market but also offered in Wales and Northern Ireland (Pring et al. 2009; Raffe 2015). It was not until the Review of Qualifications for 14 to 19-year-olds in Wales (Welsh Government 2012a) and the subsequent establishment of Qualifications Wales in 2015 that Wales started to diverge from England by developing Wales-only VQs in the HSCC and CBE sectors.

Alongside the changes shown in Figure 1, there have also been the introduction of new VQs aimed at bridging the vocational-academic divide – driven by reforms initiated in, and designed primarily for, England – including General National VQs, advanced vocational certificates of education, vocational A levels, and applied generals. The qualifications system in Wales is strewn with the remains of these reforms that were "littered with good intentions but poor outcomes" (Patel 2012, p.228). These views resonate with a finding of the Nuffield Review of Education for 14–19-year-olds (Pring 2009, p.3) that there have been "too many fragmented and disconnected interventions by governments which do not cohere in some overall sense of purpose". This 'political tinkering' (Hodgson and Spours 2012) has been compounded by the

frequent changes to ministers, government departments and education bodies responsible for the policy and regulation of VET and VQs in Wales. For example, as shown in Figure 1, there have been three different organisations – ACCAC, the Welsh Government, and now Qualifications Wales – responsible for the regulation and reform of VQs since devolution. Similarly, there has been frequent change to the organisations responsible for post-16 education policy and funding with ELWa, the Welsh Government and now Medr all being responsible over the past 25 years.



*Figure 1 - Timeline of key developments in VQs policy in Wales from the mid-1980s until the reform of HSCC and CBE qualifications (compiled by the author)* 

Hodgson and Spours' (2012) observations on the frequent institutional changes in the English VET system are highly relevant to Wales. They argue that the short lifespan of ministers, government departments, sponsored bodies and civil servants means that it is inevitable that policymakers will repeat the mistakes of the past. Higham and Yeomans (2007) call this 'policy amnesia'. Indeed, the recurrent changes to organisations responsible for VET and VQs that have also taken place in Wales may have limited the time and stability necessary to build what have been termed *organisational and policy memory*.

*Organisational memory* is defined by Foroughi et al. (2020, p.1726) as the "ways that organisations and organising processes shape, and are shaped by, remembering and forgetting". Organisational memory has been widely researched, particularly in a business management context (see, for example, Paoli and Prencipe 2003; Balmer and Burghausen 2015; Langenmayr 2016). It is considered by some to be one of the most significant resources in an organisation and has been linked with improved decision making, organisational learning and more effective change management (Walsh and Ungson 1991; 2009; Fiedler and Welpe 2010; Kmieciak 2019). Watson (2011, p.413), for example, argues that organisational memory requires government departments and sponsored bodies (and those within these organisations) to remain in place for long enough to build policy memory.

*Policy memory* is described as the knowledge accumulated from the successes and failures of past policy initiatives (Laczik et al. 2023). Relatedly, *policy learning* – which Raffe and Spours (2007a, p.1) describe as the "ability of governments, or systems of governance, to inform policy development by drawing lessons from available evidence and experience" – and its impact on *policy memory*, has been widely explored in the context of 14-19 education in England (for example, Higham and Yeomans 2007; Hodgson and Spours 2016; Laczik et al. 2023). Raffe (2015) claims that the institutions responsible for developing, monitoring and regulating VQs should have sufficient life expectancy to allow them to accumulate expertise and policy memory and to evaluate

the impact of reforms. Huddleston and Laczik (2018), when referring to the development of 14-19 Diplomas, claim that a lack of policy memory brings with it significant economic and social costs for learners, learning providers and teachers (about £295.6 million by 2011 according to Isaacs 2013). In a Welsh context, Raffe and Spours (2007a, p.3) briefly refer to policy memory and argue that the potential for policy learning is constrained "by institutional restructuring and by changes in personnel with the consequent loss of policy memory". However, given the instability of the bodies responsible for VQs and VET in Wales, it is somewhat surprising that the implications of organisational memory, policy memory and policy learning on the Welsh VET system have not been explored more widely.

### 2.5. Review of qualifications for 14 to 19-year-olds in Wales

Much of the research, literature and government reviews on VET and VQs in the UK over the past 40 years have focussed on England. However, some UK national reviews such as the De Ville Review of VQs (Manpower Services Commission and Department for Education and Science 1986) and the Nuffield Review of Education for 14-19-yearolds (Pring et al. 2009) included Wales, as a distinct entity, within their scope. Nevertheless, until the Welsh Government's (2012a) Review of Qualifications for 14 to 19-year-olds, Wales had never, by itself, been the focus of a government-led review of qualifications. Led by the late Huw Evans OBE, the review indicated an appetite for Wales to diverge from other parts of the UK and concluded that "the time has come to develop a high-quality, robust and distinctive national qualifications system for 14 to 19-year-olds in Wales, and to support divergence between Wales and other parts of the UK where this is in the interests of learners in Wales" (Welsh Government 2012a, p.4). The review made 42 recommendations, all of which were accepted by Leighton Andrews AM, the Minister for Education at the time. The primary recommendation was that "a single body should be established to regulate, approve and assure the quality of all qualifications (below degree level) available in Wales, bringing in a new and stronger approach to regulation" (Welsh Government 2012a, p.5). This led the way for

the establishment of Qualifications Wales as the independent regulator of qualifications in Wales.

#### 2.5.1. Establishment of Qualifications Wales

In January 2015 – following the Welsh Government's initial response to the recommendations of the review (Welsh Government 2012b), a public consultation, and pre-legislative scrutiny by the National Assembly for Wales' (2014a) Children, Young People and Education Committee – the National Assembly for Wales approved the Qualifications Wales Bill (National Assembly for Wales 2015a). The Bill provided the legislation for the establishment of Qualifications Wales as the independent body responsible for the regulation of non-degree qualifications in Wales. The summary document accompanying the Bill (National Assembly for Wales 2015b, p.1) set out that the establishment of Qualifications Wales aimed to address the four main limitations of the qualifications system in Wales which were considered to be that:

- "there was no single organisation dedicated to ensuring the effectiveness of qualifications and the qualifications system in Wales;
- there were no powers to prioritise qualifications in order to focus regulatory activity where it was needed;
- there were 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 system at the time was too limited" (National Assembly for Wales 2015b, p.1).

In a statement to the National Assembly for Wales in December 2014, the Education and Skills Minister at the time, Huw Lewis AM, stated that "in creating Qualifications Wales, I am delivering against my commitments, first, to independent regulation, secondly, to the strengthening of regulation, and, thirdly, to the simplification of the qualifications system in Wales" (National Assembly for Wales 2014b, p.1). The Qualifications Wales Bill set out that Qualifications Wales' principal aims would be:

- "to ensure that qualifications, and the Welsh qualifications system, are effective in meeting the reasonable needs of learners in Wales; and
- to promote public confidence in qualifications and the Welsh qualifications system" (National Assembly for Wales 2015a, p.2).

The Bill also stated that the establishment of Qualifications Wales was "part of the move away from a three-country model of qualifications regulation (with England and Northern Ireland) which the Welsh Government says is currently heavily reliant on the regulator in England, Ofqual" (National Assembly for Wales 2015a, p.2). The Bill removed the functions of Welsh Ministers in relation to qualifications, the qualifications system and how the new body Qualifications Wales would function. It outlined that Qualifications Wales would be an independent sponsored body, funded by the Welsh Government and accountable to the people of Wales through the Senedd. Moreover, it clearly set out the extent of the regulatory remit of Qualifications are taken in Wales and in the interests of Welsh learners (National Assembly for Wales 2014b).

Qualifications Wales was established in September 2015 and inherited its regulatory powers, through the Qualifications Wales Act, on 21 September 2015. It set about regulating a complex qualifications system which, at the time, included more than 130 awarding bodies who were awarding more than 420,000 VQ certificates each year (Qualifications Wales 2024). Further, Qualifications Wales also began to identify how to effectively review and reform the vast range of VQs on offer in Wales.

#### 2.5.2. Qualifications Wales' approach to the review and reform of VQs

One of the first considerations for Qualifications Wales following its establishment was how to meaningfully review and, if needed, reform the plethora of VQs – more than 8,700 VQs that were eligible for public funding in Wales (Qualifications Wales 2024). This challenge was more pressing given the risks (to the viability and future availability of VQs on offer in Wales) posed by the qualification reforms taking place in England in response to reviews of vocational education (Wolf 2011), apprenticeships (Richard 2012), adult VQs (Whitehead 2013), and the subsequent publication of the UK Government's Skills Plan which announced considerable rationalisation of the qualifications market in England (Department for Business, Innovation and Skills 2016). Qualifications Wales' VQ Strategy (2016a) outlined that sector reviews – which are detailed reviews of qualifications and the qualifications system in priority employment sectors in Wales – "will form the backbone of our work with VQs over the next five years" (Qualifications Wales 2016a, p.6). The first of these reviews focussed on the HSCC sector.

#### 2.5.3. HSCC sector review

Qualifications Wales published the findings of its first sector review, focussed on the HSCC sector, in July 2016 (Qualifications Wales 2016b). The report outlined many findings, most of which presented a bleak picture of the VQs on offer in the HSCC sector in Wales. The review identified several concerns including (Qualifications Wales 2016b):

- a complex qualification system;
- unclear progression routes for learners;
- inconsistent and burdensome assessment and quality-assurance processes;
- insufficient or ineffective opportunities for learners to be assessed in Welsh; and
- some learners being poorly prepared to enter the workplace.

These findings aligned with those of previous UK reviews which also criticised the complex range of VQs on offer (for example, Manpower Services Commission and Department for Education and Science 1986; Pring et al. 2009; Wolf 2011). To address the issues identified, Qualifications Wales outlined an ambitious commitment to develop approval criteria for a suite of new HSCC qualifications for Wales (listed in Table 1), with a target date of September 2019 for first teaching:

Level 2 Children's Care, Play, Learning and Development: Core
Level 2 Children's Care, Play, Learning and Development: Practice
Level 2 Children's Care, Play, Learning and Development: Practice and Theory
Level 2 Health and Social Care: Core
Level 2 Health and Social Care: Practice (Adults)
Level 2 Health and Social Care: Principles and Contexts
Level 3 Children's Care, Play, Learning and Development: Practice
Level 3 Health and Social Care: Practice (Adults)
Level 3 Health and Social Care: Practice (Children and Young People)
Level 3 Children's Care, Play, Learning and Development: Practice and Theory
Level 3 Health and Social Care: Principles and Context
Level 4 Adult Placement / Shared Lives
Level 4 Preparing for Leadership and Management in Children's Care, Play,
Learning and Development
Level 4 Professional Practice in Children's Care, Play, Learning and Development
Level 4 Preparing for Leadership and Management in Health and Social Care
Level 4 Professional Practice in Health and Social Care
Level 4 Independent Advocacy
Level 4 Social Services Practitioner
Level 5 Leadership and Management of Children's Care, Play, Learning and
Development: Practice
Level 5 Leadership and Management of Health and Social Care: Practice

Table 1 - VQs developed as an outcome of the HSCC sector review

Moreover, the review report set out Qualifications Wales' desire to commission the development of the new qualifications and restrict provision to a single supplier, a route that could be taken due to the powers given to Qualifications Wales through the Qualifications Wales Act (National Assembly for Wales 2015a). This was a very bold proposal that signalled Qualifications Wales' intent to diverge from other parts of the UK in the interests of securing the future VQ provision in the HSCC sector in Wales.

However, the proposal to develop new HSCC qualifications was not universally welcomed by stakeholders with some, mainly awarding bodies, raising concerns in the public consultation about the risks associated with a single supplier, including the impact on innovation, loss of choice for learners and providers, and concerns about the portability of Wales-only qualifications within other parts of the UK (Qualifications Wales 2016c). Nevertheless, despite these concerns, the decision was made by Qualifications Wales to proceed with the development of approval criteria for new HSCC qualifications for Wales and to restrict provision to a single supplier. Qualifications Wales (2016b, p.3) committed to "involving stakeholders in every stage in the journey" in reforming HSCC qualifications.

#### 2.5.4. CBE sector review

Qualifications Wales' second sector review soon followed with the publication of the CBE review findings in February 2018 (Qualifications Wales 2018a). The findings presented a similarly bleak picture to those found in the HSCC sector review – a complex and confusing qualifications offer that was not always meeting the needs of learners and employers. Moreover, the review identified several further concerns including (Qualifications Wales 2018a):

- unclear progression routes for learners;
- learners often specialising too early and not having an overview of other CBE trades;
- outdated and repetitive content that did not sufficiently cover working with new technologies;
- learners leaving FE were often not ready for the workplace; and
- assessments for the qualifications were often burdensome and repetitive.

Similar to the findings of the HSCC sector review, these concerns resonate with previous UK reviews that identified a complex system with unclear progression routes for learners (for example, Manpower Services Commission and Department for Education and Science 1986; Pring et al. 2009; Wolf 2011). To address the issues identified by the CBE sector review, the report outlined a proposal to commission the development of new CBE qualifications for learners in FE and apprenticeships (Qualifications Wales 2018a). The proposals included the preferred option to develop new broad-based Foundation and Progression qualifications for learners studying in FE and new trade specific VQs for use on apprenticeships with a target date of first

teaching of September 2021. Table 2 shows the qualifications which approval criteria were developed for as an outcome of the CBE sector review:

Level 2 Foundation in Construction and Building Services Engineering	
Level 2 Core in Construction and Building Services Engineering	
Level 2 Progression in Building Services Engineering	
Level 2 Progression in Construction	
Level 3 Building Services Engineering qualifications, to include a qualification in	
each of the following trade pathways:	
Heating and ventilating installer	
Plumbing and heating	
Heating and ventilating craftsperson	
Electrotechnical installation	
Level 3 Construction qualifications, to include a qualification in each of the	
following trade pathways:	
Dry lining	
Roof slating and tiling	
Civil operations – groundworks	
Bricklaying	
Architectural joinery	
Site carpentry	
Timber frame erection	
Painting and decorating	
Solid plastering	
Wall and floor tiling	
Level 3 Extended Progression in Electrotechnical Installation	

Table 2 - VQs developed as an outcome of the CBE sector review

Like the HSCC sector review, the public consultation document that accompanied the CBE sector review report indicated a desire from Qualifications Wales to restrict the development of the new qualifications to a single supplier (Qualifications Wales 2018b). The consultation responses indicated general support for the proposals but, as with the HSCC consultation, concerns were raised by some respondents about the potential negative impact on quality, choice for learners and learning providers, and portability of the qualifications (Qualifications Wales 2018b). Nevertheless, despite these concerns, Qualifications Wales proceeded with commissioning the development of new CBE qualifications and restricting the development of the qualifications to a

single supplier. Again, as with the HSCC reforms, Qualifications Wales (2018a) committed to involve stakeholders in the development of approval criteria for new CBE qualifications.

### 2.6. Conclusion

This chapter has provided an overview of the VET system in Wales and has discussed the key policy developments that have influenced VQs in Wales from the mid-1980s up to the HSCC and CBE reforms that are the focus of this thesis. Whilst acknowledging the struggle to define VET and VQs, the chapter sets out the marginalisation of the Wales agenda before parliamentary devolution and the developments since. It provides a narrative that seeks to summarise a policy context that is clouded by frequent change and institutional instability, both before and after devolution. The establishment of Qualifications Wales and their approach to conducting detailed sector reviews of VQs are discussed with a specific focus on the HSCC and CBE sector reviews that outlined ambitious plans to develop new VQs. In setting this out, we might conclude that Wales was attempting to diverge from the dependence on VQs developed for the English market by developing Wales-only VQs in the HSCC and CBE sectors. It is claimed that stakeholders were extensively involved in both sector reviews and would be included in the subsequent development of approval criteria for new VQs (Qualifications Wales 2016b; 2018a) but there is a lack of evidence about the extent of involvement and influence. This thesis aims to address this gap in knowledge by exploring which stakeholders were included/excluded and influenced the process of reforming VQs in Wales.

The next chapter builds on the discussion presented in this chapter and explores the literature on the involvement (and non-involvement) of stakeholders in the reform of VQs.

# Chapter 3 – Literature Review – Stakeholder involvement in the reform of VQs

## 3.1. Introduction

In this chapter, literature on the involvement of stakeholders in the reform of VQs is explored. In critically discussing this literature, the aim is to understand why stakeholders have (not) been involved/included in previous reforms of VQs across the UK, and to examine the nature and extent of stakeholder influence. Such discussions will help inform understandings of stakeholder engagement within the context of the VQ reforms in Wales. The particular focus of this chapter is on VQ reforms across the UK<sup>3</sup> since the mid-1980s – as a period from which major changes in the delivery of education/qualifications reform began. Further, where relevant, a comparative analysis will be drawn with the way stakeholders in other countries are involved in vocational reforms and the development of VET policy. This provides some critical insight into the potential benefits, problems and opportunities for wider stakeholder engagement. The chapter begins by setting out a framework for examining which stakeholders have a potential interest in the reform of VQs and what their interests might be. It then moves on to consider the involvement of stakeholders in previous VQ reforms (and in VET more broadly) across the UK. It focuses on the prominent role of employers, Welsh Government as a central actor in the VET system and the marginalisation of teachers, trade unions and learners.

### 3.2. Stakeholder involvement

Over 25 years ago, Finlay (1998) called for the establishment of participative, democratic processes in the formulation and implementation of VET policy. He argued that stakeholder involvement, negotiation and consensus are key. Others (for example,

<sup>&</sup>lt;sup>3</sup> As explained in Chapter 2 (Section 2.4), most VQs offered in Wales have been offered on a threecountry basis – Wales, England and Northern Ireland – and this chapter will primarily focus on the reforms that have taken place in these three countries since the mid-1980s.

Retzl and Ernst 2013; Ranson 2018) have made similar calls for the democratic involvement and participation of stakeholders in education systems. Involvement in education and qualification reforms is considered to offer several benefits such as greater buy-in from stakeholders and lower levels of resistance (OECD 2010; Busemeyer and Trampusch 2012; European Training Foundation 2016; Emmenegger and Seitzl 2020). These claims imply that involving a range of stakeholders in vocational reforms is desirable or is likely to lead to positive outcomes. Yet, commentators (for example, Helgøy and Homme 2006; Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020) report several challenges including the considerable time that it can take, the bureaucratic nature of involvement, and conflict between stakeholders. Moreover, Finlay (1998) suggests that changes implemented through the involvement and participation of stakeholders tend to be incremental, rather than revolutionary, and are unlikely to immediately challenge the status quo. Nevertheless, he also claims that this should lead to changes that are deep rooted and widely supported by stakeholders (Finlay 1998).

#### 3.2.1. Framing stakeholder involvement

Finlay (1998, p.6) uses a diagram (Figure 2) to set out the relationship between the major stakeholder groups with a potential interest in the formation of VET policy. This is useful in showing the main overarching stakeholder groups: individual, institutional, employers and government.

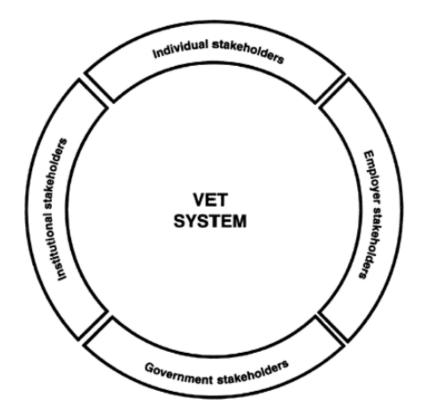


Figure 2 - The relationship between major VET stakeholders (Finlay 1998, p.6)

In adopting the groups identified by Finlay, Table 3 (based on the table in Finlay 1998, p.7) is adapted to indicate the range of stakeholders, although not exhaustive, who have a stake and a potential interest in the reform of VQs in Wales. Finlay's model is helpful in categorising the different groups but does little to demonstrate the relationship between stakeholders, the potential overlap between those in each group, or how involvement and influence is distributed. Nevertheless, Finlay (1998) does recognise that, in any vocational reform, influence is likely to be unevenly distributed and over time may shift between stakeholders. Similarly for Table 3 there is no suggestion, at this point (but see Chapter 7 Section 7.3 for a related discussion), that all stakeholders listed should have, or do have, the same level of involvement and/or influence in vocational reforms or that the level of influence will be equally distributed. Neither is there an imputation that stakeholders within a particular group will have common and agreed interests in the reform of VQs. Indeed, Clarke and Winch (2007) argue that a key challenge for governments and bodies responsible for implementing vocational reforms are the different, often competing, interests of stakeholders, a view

which is supported by others (for example, Gleeson and Keep 2004; Lindell 2004; Ferns et al. 2016; Stuart 2019; Bettencourt et al. 2024) and discussed in the next section.

Individuals	Institutions	Government	Employers
Teachers	FE colleges	Welsh Government	Large multinationals <sup>4</sup>
		(ministers and civil	
		servants)	
Workers	WBL providers	Local government	Small and medium
			sized organisations <sup>5</sup>
Learners	Secondary schools	Welsh Government	Micro businesses <sup>6</sup>
		sponsored bodies	
Parents	HE institutions	Regional Skills	Public sector
		Partnerships	employers
Trainers/ Assessors	Teaching/Sector trade	Regional education	Private sector
	unions	consortia	employers
	Awarding bodies	UK Government	Employers'
			representative bodies
	Sector/professional		
	bodies		
	Learning provider		
	representative bodies		

Table 3 - Examples of VET stakeholders in Wales (compiled by the author based on a table in Finlay 1998, p.7)

As will be discussed throughout this chapter, the involvement and influence of stakeholders in previous vocational reforms across the UK over the past 40 years has always been unevenly distributed (and on unequal terms) with the voices of some stakeholders prioritised above others. The interests (and voices) of employers and central government have been dominant whilst teachers, trade unions and learners have been marginalised or excluded. Factors such as whether stakeholders have institutional structures to represent their interests, whether they have the desire (or incentive) to participate, or whether they have the necessary time, capacity, human

<sup>&</sup>lt;sup>4</sup> Large businesses are those with more than 250 employees.

<sup>&</sup>lt;sup>5</sup> SMEs are those with between 10-249 employees.

<sup>&</sup>lt;sup>6</sup> Micro businesses are those with between 1-9 employees.

and/or financial resources, are all considered to impact stakeholder involvement and influence in vocational reforms (Raggatt and Williams 1999; Brand 1998; Cook-Sather 2006; Ertl and Stasz 2010; Bettencourt et al. 2024).

#### 3.2.2. Stakeholder interests

Stakeholders have a range of interests in the reform of VQs, some of which conflict with the interests of others (Keep 2012; Bathmaker 2013; Wheelahan and Moodie 2018). For example, Gleeson and Keep (2004) argue that individual learners often want to maximise the benefits of gaining a VQ, at a low cost, in order to obtain a competitive advantage over others when competing for jobs in the economy. Learners may also have an interest in VQs being recognised, certificated and transferable to a range of employment opportunities, because this can lead to career development and opportunities in the labour market (Billett 2011; 2019; Cooney and Stuart 2012). Interests will also vary among individual learners depending on their reasons for studying. Billett (2011) claims that those studying VET and VQs represent the most diverse set of learners - in terms of their interests, readiness for learning and prior experiences - of any of the key educational sectors. However, as will be discussed in Section 3.7, the extant literature highlights that learners have been marginalised in vocational reforms across the UK over the last 40 years and have had little influence over the decisions that affect them (Elwood and Lundy 2010; Elwood 2012; 2013; Billett 2013).

Employers also have a range of interests in VET and VQ reforms, some of which can conflict with the interests of learners and other stakeholders. Clarke and Winch (2007) claim that employers consider VQs to be a means of skilling their workforce to meet immediate (and, to an extent, future) needs. Others (for example, Gleeson and Keep 2004) argue that employers desire an oversupply of skilled labour so that they can have choice when selecting individuals to recruit for jobs which can drive down wages. Employers may also have an interest in VQs being organisation specific and nontransferable to limit the likelihood of qualified staff being poached by competitors

(Stevens 2001). However, employers are not a homogenous group that desire the same outcomes. Their interests will likely differ depending on the type of employer with factors such as the size, sector and location all having an influence (Trampusch 2009; Keep 2012; Relly and Laczik 2022). As will be discussed in Section 3.4, the UK Government's neoliberal<sup>7</sup> approach to VQ reforms in England (and the wider UK prior to devolution) has meant that the interests of employers have been prioritised above others over the past 40 years (Ertl and Stasz 2010; Keep 2015a; 2015b; Huddleston and Laczik 2022).

Alongside employers, there are a range of trade unions, such as Unison, Unite and GMB, who represent the interests of workers across specific sectors. There are also several teaching and education unions who represent their members in constituent parts of the education workforce in Wales (for example, the National Education Union Cymru, NASUWT<sup>8</sup> Cymru, National Association of Headteachers Cymru, and the University and College Union). These unions compete with each other for members, to some degree, and have their own priorities and interests in the reform of VQs. However, as will be further discussed in Section 3.6, across the UK, trade unions have seen a gradual decline in involvement and influence in VET since the 1980s (Keep 2007; 2015b; Keep et al. 2010; Stuart and Huzzard 2017; Stuart 2019). As such, sector specific trade unions have been almost entirely excluded from vocational reforms at a national level across the UK (Keep et al. 2010; Keep 2015b; Stuart 2019) albeit with a specific role in workplace learning through the Union Learning Fund (see Stuart and Huzzard 2017; Stuart 2019). Further, McIlroy and Croucher (2013) claim that UK trade unions have relatively low (and shrinking) levels of resources which may contribute to less involvement and influence over VET and vocational reforms than trade unions in

<sup>&</sup>lt;sup>7</sup> "Neoliberalism is a pervasive and increasingly global ideology, associated with the favouring of free market competition and private property rights, reduction or abolishment of government intervention and expenditure, and valuation of individual 'freedom of choice'" (Carlquist and Phelps 2014, p.1231). <sup>8</sup> Previously known as National Association of Schoolmasters Union of Women Teachers.

countries with strong histories of social partnership<sup>9</sup> such as Germany, Denmark, the Netherlands, and Austria (Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020).

Equally, although there may be some common interests, learning providers and those who work within them (for example, teachers, assessors, headteachers) will also have a range of interests in the reform of VQs. Secondary schools, FE colleges, WBL providers (both within FE colleges and private providers), adult community learning and, to an extent, HE institutions all offer publicly funded VQs. Providers differ on the provision they offer, the age of learners they offer it to, the government departments they report to, and the funding systems which underpin their work. These different types of learning providers have varying interests and are arguably locked in competition with each other for learners, funding and political influence (ColegauCymru 2021). Even within providers, it only takes one look at the results of the most recent National Education Workforce Survey in Wales to begin to understand the vast range of views and interests of professionals working within providers (Education Workforce Council 2021). Learning providers are made up of numerous individuals who will have their own interests in VQs and influence is likely to be unevenly distributed between individuals depending on their job role and hierarchical level within their institutions (Hatcher 2005).

As it is, stakeholders have a range of conflicting interests in the reform of VQs and seeking agreement and consensus amongst these different interests is a challenging endeavour. Therefore, Clarke and Winch (2007) claim that the VET system (and associated VQ reforms) can be seen as representing a compromise between these different stakeholder interests but also reflects the power associated with each interest group. Some countries, discussed in the next section, have established arrangements

<sup>&</sup>lt;sup>9</sup> According to the Welsh Government (2024b, p.3), social partnership is a way of working designed to pursue mutual gains within the context of policy development and implementation. It works on the basic principle that more can be achieved by employers and workers, predominantly through their trade unions, working together in a spirit of co-operation and collaboration.

and mechanisms to provide a range of actors with a voice on more equal terms in vocational reforms with an aim of seeking compromise and/or consensus.

#### 3.2.3. Stakeholders in other countries

Different and competing stakeholder interests are not unique to Wales nor the wider UK. But what differentiates some countries, particularly those with so-called 'collective skill formation systems' – such as Germany, Denmark, Austria, Switzerland and the Netherlands – is that they have formal mechanisms and social partnership arrangements (comprising employers' associations and trade unions) in place to represent the interests of different actors and to negotiate, compromise and seek consensus during vocational reforms (Bosch and Charest 2008; Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020). This contrasts with countries that follow more neoliberal principles – such as the UK, USA and Canada – where the weakness of the social actors and of social bargaining structures contributes to VET having a poor reputation and low social status (Bosch and Charest 2008; Fortwengel et al. 2019; Vossiek 2019). Nevertheless, although VET is argued to be organised differently in liberal and more collective skill formation systems (Wheelahan and Moodie 2018), there are important lessons that can be learnt from how stakeholders are involved in VET and VQ reforms in other countries.

For example, the German VET system – which has drawn significant international attention, particularly for the strength of its dual apprenticeship system (Deissinger and Gonon 2016) – involves the social partners (consisting of employers, mainly represented by employers' associations, and employees, who are primarily organised through the major trade union in each sector) with more equal representation at all levels of decision making, including the political-strategic level (Emmenegger et al. 2019; 2020). Similarly, in Switzerland, the social partners (comprising employer associations and trade unions) play an important part in shaping and influencing the governance of the VET system at all levels (Deissinger and Gonon 2016). Further, social partners (consisting of trade unions and employer associations, alongside vocational

school, teacher and learner representatives) work closely to govern the Danish VET system and provide advice and recommendations to the Ministry of Education (Emmenegger and Seitzl 2020). This contrasts with liberal market economies of the English-speaking world such as the UK, USA, Canada and Australia where there is almost no place for social partnership in the governance of VET (Bosch and Charest 2008; Fortwengel et al. 2019; Vossiek 2019).

It can be very difficult to draw a causal link between those countries with strong stakeholder and social partner involvement in the governance of VET and the strength and outcomes of their VET systems. Nevertheless, Emmenegger and Seitzl (2020) suggest that it seems plausible that the involvement of social partners in decision making, thus having a collective approach to identifying and implementing solutions, should lead to better VET and VQs that provide the economy with a well-trained and competitive workforce. It is claimed that collective skill formation systems have several distinguishing features, including low levels of youth unemployment, access to good quality VET that bolsters the competitiveness of their economies, and low levels of inequality (Finegold and Soskice 1988; Hall and Soskice 2001; Culpepper 2003; Busemeyer 2015; Emmenegger et al. 2019; 2020).

Using Germany and Denmark as examples, Ibsen and Thelen (2020) observe that one of the strengths of the VET systems in countries with strong social partner involvement is that they fulfil important economic objectives such as providing employers with a continuous supply of skilled workers, while also performing important social inclusion objectives, with more opportunities for young people from low income and non-academic backgrounds to access VET and the VQs necessary to obtain well paid and stable employment. It could be argued that these features are not characteristic of VET systems across the UK and in countries without strong social partner involvement in the governance of VET such as the USA and Canada. It is claimed that in these countries employers complain of shortages in vocationally qualified labour (Bosch and Charest 2008), there are difficulties sustaining institutions which support high-quality

apprenticeship training (Fortwengel et al. 2019) and VET is often marginalised and seen as second best to general and higher education (Busemeyer and Vossiek 2016; Clarke et al. 2021).

Busemeyer and Trampusch (2012) and others (for example, Busemeyer and Vossiek 2016; Wheelahan and Moodie 2018; Vossiek 2019) claim that in collective skill formation systems employers are strongly involved in the governance, financing and delivery of VET, in contrast to liberal market systems such as in the UK as will be discussed in Section 3.4. For example, Wheelahan and Moodie (2018) claim that employers in collective skill formation systems are closely involved in the development of qualifications thereby providing them with a good understanding of VQs and what the skills of those who have completed those qualifications will possess. This compares with liberal market systems whereby employers are less involved and, therefore, are less certain of the content and value of VQs (Moodie 2008; Wheelahan and Moodie 2018). In the German system employers play an important role in the governance of the VET system which means that vocational programmes reflect the increasingly complex skills needed by German employers (Busemeyer and Thelen 2020; Ibsen and Thelen 2020). Further, Nielson (2011) suggests that the involvement of social partners in the development of VET policy in the countries with collective skill formation systems provides a strong link between education and the world of work, identifies employer needs that should inform the development of learning programmes and VQs, and ensures that VQs are universally valued and recognised, particularly in the labour market.

Emmenegger and Seitzl (2020) claim that social partnership arrangements in countries with collective skill formation systems are often on a more equal basis compared with the fragmented and uneven involvement (and influence) in VQ reforms across the UK and other countries that have weak/absent social partnership arrangements. Alongside social partners, there is also a seat at the table for other stakeholders such as teachers and learner representatives. For example, in Denmark, VET boards – which govern the

VET system and are able to recommend the development or abolishment of vocational programmes and qualifications – comprise trade unions, employer associations, learning providers and learner representatives (Emmenegger and Seitzl 2020). Further, in the German system, regional VET Boards are made up of representatives of employers, employees, and teachers from vocational schools (Emmenegger et al. 2020). However, more equal representation is not in place in all countries. For example, as will be further discussed in Section 3.6, trade unions in Switzerland have less of a role (and on less equal terms) than they do in other collective skill formation systems. Nevertheless, Emmenegger and Seitzl (2020) suggest that in most collective skill formation systems the relationship between social partners is based on inclusive terms, which provides a platform for a range of interests (and voices) to be represented in vocational reforms.

Although collective skill formation systems offer a number of strengths as noted above, there are particular challenges when expecting a range of diverse actors, with competing views and interests, to collaborate and cooperate in the VET system. As such, Busemeyer and Trampusch (2012) and Emmenegger et al. (2019) claim that these systems continually need the input and support of stakeholders and, therefore, are vulnerable to cooperation challenges. For example, in Germany the widespread involvement of social partners at all levels of decision-making means that there are different actors who can veto developments and, therefore, are prone to conflict (Emmenegger and Seitzl 2020). Therefore, although collective skill formation systems are considered to have an excellent reputation, they also face a number of challenges when involving a range of actors and balancing different interests in the VET system.

### **3.3.** The Welsh Government as a central actor

The Welsh Government is a central actor in the education system in Wales (James 2019). Prior to devolution, Wales was governed by administrations in London and was subject to policy changes and reforms implemented by the UK Government, which gave shape and form to the VET system that was inherited. Principally, the abandonment of tripartite arrangements in the 1980s under the Thatcher Conservative government that was committed to neoliberal policies arguably led to the UK Government taking a more central role in the development of VET policy (Gamble 1994; Keep 2007; 2015b; Keep et al. 2010). These developments, it is claimed, increased the influence of the state and throughout the 1980s and 1990s the UK Government, alongside employers, became the central actors in the development of VET policy across the UK (Steer et al. 2007; Keep et al. 2010; Stuart 2019).

It is argued by Pring et al (2009) and others (for example, Robson et al. 2024) that since devolution in 1999, the Welsh Government has attempted to implement a distinctive policy agenda for qualifications that diverged from England. This has included the development of the Welsh Baccalaureate, the introduction of the Credit and Qualifications Framework for Wales, the creation (and subsequent abolishment) of ACCAC as the authority responsible for qualifications, curriculum and assessment, and, more recently, the establishment of Qualifications Wales as the national qualifications regulator (see Chapter 2 Section 2.5.1). According to Rees (2011) and others (for example, Power 2016; James 2019; Power and Taylor 2021), key to this distinct policy agenda has been the social-democratic belief that cooperation, partnership and collaboration are the most effective ways of implementing education policy. There is some evidence that collaboration and partnership are a stronger force in Wales (and other devolved nations) than in England. For example, James (2011), in his research on dialogue between FE college principals and policymakers, points to greater engagement between these stakeholders, as well as influence by college principals on policymakers in Wales and Scotland when compared with England. Similarly, Raffe and

Spours (2007a) draw our attention to the prevalence of collaboration and partnership working in the development of educational policy in Wales.

The notions of partnership and collaboration are widely espoused in Welsh Government reviews relating to education and training. For example, the Welsh Government's Review of Qualifications for 14-19-year-olds (discussed in Chapter 2 Section 2.5) stated that "a country the size of Wales has an opportunity to develop effective collaboration between government, employers, learning providers, awarding organisations and others, and to develop consensus" (Welsh Government 2012a, p.18). The Welsh Government also passed the Well-being of Future Generations Act in 2015 which requires public bodies to consider the long-term impact of their decisions and to involve and collaborate with others in their work (Welsh Government 2015). However, how far does partnership and collaboration truly operate in the VET system in Wales beyond political rhetoric? According to ColegauCymru the "post-16 education sector in Wales is hindered by insufficient collaboration between institutions" (2021, p.3) whilst Estyn (2021) and David (2023), in his Welsh Government commissioned review of the transitions from education to employment, recommended the need for greater collaboration between schools and colleges. Indeed, it has been argued that competition between institutions often hinders collaboration (Ravenhill and Woodhouse 2023). Further, other key actors in the VET system (such as employers and awarding bodies) are primarily commercial organisations, operating in a competitive market, and rarely is it in their interests to collaborate with others in the VET system without a directive or incentive from the Welsh Government (or their sponsored bodies).

The Welsh Government is a central actor in the VET system in Wales and retains significant power to influence education and training policy; powers that have become more comprehensive and secure since the Wales Act 2017 (Welsh Government 2017). The Welsh Government has the legal powers to intervene at every level of the VET system, including determining what vocational programmes are funded, the VQs that

can be included in learning programmes, the amount of funding that is allocated to each qualification and the ways in which VET programmes are monitored, regulated and inspected. Social partnership and the extent to which it is a mechanism for delivering VET policy in Wales is also within the remit of the Welsh Government, yet it remains on the margins. The recent introduction of the Social Partnership and Public Procurement Act (Welsh Government 2023b) indicates an intent to introduce some type of social partnership model. But, apart from naming representatives of FE colleges as being members of the Social Partnership Council for Wales, there is no explicit mention of VET within the Act and there is no indication whether the Welsh Government's social partnership ambitions extend to the VET system.

The responsibilities of the Welsh Government have been delegated to a vast number of sponsored bodies over the past 25 years. For example, Qualifications Wales, Estyn and Medr (similar to previous bodies such as ACCAC and ELWa) are all funded by the Welsh Government and, in the main, most report directly to Welsh Government ministers. It is claimed that sponsored bodies offer the benefits of having expertise and experience in specialist areas that may not be held within government and they can use this expertise to support national strategies, initiatives and programmes (Welsh Government 2016). However, Keep (2007, p.162), when referring to similar bodies in England, claims that these bodies are "creatures of government" and are at the whim of ministers. Their primary role is to implement the directions from government ministers and civil servants which, Keep (2002) argues, allows governments to devolve responsibility and apportion blame to other organisations if things go wrong whilst retaining central control. Keep (2006; 2007; 2015b) and others (for example, Oliver 2010; Ball and Junemann 2016) have written extensively about the governance of the English education and training system but far less is known about the VET system in Wales. What is not properly understood – and which this thesis begins to address – is the extent to which Welsh Government sponsored bodies are involved in, and influence, VQ reforms in Wales and whether claims such as those above made by Keep (2007) also apply to Wales.

### 3.4. Employers and the reform of VQs

There is substantial UK literature exploring the involvement of employers in the reform of VQs, particularly their role in the development of NVQs in Wales, England and Northern Ireland in the late 1980s, the ill-fated 14-19 Diplomas and contested T Levels in England (for example, Raggatt and Williams 1999; Huddleston et al. 2005; Bathmaker 2013; Haynes et al. 2013; Misselke 2022). The focus of the UK literature reflects the prominent role that employers have been given in the reform of VQs across the UK since the 1980s. The shift towards a market discourse in the 1980s and 1990s saw the UK Government placing the needs of employers at the forefront of VET policy (Finlay 1998; Gleeson and Keep 2004; Stuart 2019; Relly and Laczik 2022). As such, the rhetoric from UK Government policymakers over the past 40 years has been that VQs should reflect what employers need and want (Keep 2015a).

Since devolution, the UK Government has continued to prioritise the interests of employers, placing them at the heart of the VET system in England (Ertl and Stasz 2010; Huddleston and Laczik 2018; Huddleston and Branch-Haddow 2022). Yet, in Wales, Robson et al. (2024) indicated that there has been some divergence from England with employers positioned as partners and co-contributors in the VET system rather than being placed at the heart of the system. Robson et al. (2024) provide little evidence to support their claim, beyond reference to the type of language used in government policy documents. Indeed, it might be questioned whether there is much difference between the roles of employers in Wales and England, beyond political intent (and possibly rhetoric). There are examples of Welsh Government policies that continue to prioritise the needs of employers above those of others. Regional Skills Partnerships, for example, primarily focus on the interests of employers and have no trade union representation, whilst the Wales Employment and Skills Board includes individual employers, employer representative bodies, the Wales TUC but no individual trade unions. The scarcity of literature focussed on the involvement of employers in VQ reforms in Wales means that there is little firm evidence on the level to which employers are actually involved in, and influence, VQ reforms in Wales and how this differs from England.

There are a number of reasons why caution should be taken when expecting employers to take a lead in VQ reforms. First, across the UK, employer involvement in VET (or education more widely) has no statutory basis (Unwin et al. 2004; Stuart 2019; Huddleston 2020). As such, Huddleston et al. (2005, p.1), commenting almost two decades ago, argue that there is a long history of employers being given prominent roles in VQ reforms across the UK and an equally long history of employers "voting with their feet" by not fully embracing their presumed role. For example, NVQs were developed alongside employers (through employer-led bodies) and it was the view of UK Government policymakers that employers would be responsible for using the qualifications and assessing their employees, but many employers resisted such a role as time consuming and bureaucratic (Young 2011). As a result, the responsibility for NVQ assessment moved to awarding bodies. Since then, the involvement of employers in the development of 14-19 Diplomas in England has also reportedly led to mixed results (Haynes et al. 2013; Huddleston and Laczik 2018). Ertl and Stasz (2010), in their evaluation, reported that employers played a significant role in developing the content of the qualifications. But, despite Diplomas being touted as employer led, their influence was supposedly mediated by other key actors (primarily the Qualifications and Curriculum Authority) and, therefore, were not as employer led as claimed by the UK Government (Ertl and Stasz 2010).

Second, according to Fuller and Unwin (2011; 2019) and others (for example, Huddleston et al. 2005; Bathmaker 2013; Huddleston 2020), across the UK, there is a general assumption that employers are a homogenous group and there is a collective employer view on matters relating to VET and VQs. This assumption, which is often made in government policy documents (for example, Department for Business, Innovation and Skills 2016; Welsh Government 2012; 2023a), treats employers as a homogenous interest group that share common demands from the VET system (Ertl

and Stasz 2010; Haynes et al. 2013; Huddleston and Laczik 2018). However, the notion of an 'employer view' is misleading as employers often have varied and competing interests (Huddleston and Keep 1999; Gleeson and Keep 2004; Keep 2012; Stuart 2019; Huddleston 2020). There are almost 254,000 businesses in Wales across a range of sectors (Welsh Government 2023c) and 5.5 million across the UK (Department for Business, Energy and Industrial Society 2022). These employers will likely have different views about matters relating to VET and VQs. Further, different types of personnel within organisations may also have their own views, interests and perspectives on VQs (Gleeson and Keep 2004). For example, the views of a CEO of a large multinational company will likely vary significantly from those of a managing director of a small or medium sized enterprise (SME) or those in supervisory, training or human resources roles within their own organisations. Therefore, capturing a collective 'employer view' is a major challenge for those responsible for implementing reforms to VQs.

Third, involving a range of employers and capturing a representative view is arguably made more challenging by the diversity of SMEs, who are the least likely to engage and be consulted in VQ reforms (Payne 2008; Laczik and White 2009; Raffe 2015; Huddleston and Laczik 2018; Young and Hordern 2022). Indeed, involving SMEs is a major challenge for those responsible for implementing reforms given that most (>99%) private businesses in Wales and the wider UK in 2022 were SMEs, accounting for over 60% of employment in Wales and the wider UK (Department for Business, Energy and Industrial Strategy 2022; Welsh Government 2023c). Previous UK research (for example, Ertl and Stasz 2010; Huddleston and Laczik 2018; Malik 2022) has shown that involving SMEs in the reform of VQs is a challenging task, made even more difficult as employers are asked to participate on a voluntary basis. Research focussed on the development of 14-19 Diplomas (Laczik and White 2009; Ertl and Stasz 2010; Huddleston and Laczik 2012; 2018) highlighted that most Diploma Development Partnerships<sup>10</sup> struggled to involve SMEs despite some success in sectors such as hair

<sup>&</sup>lt;sup>10</sup> Diploma Development Partnerships were groups established by the Qualifications and Curriculum Authority in England – comprising employers, HE institutions, education professionals and other key

and beauty and sport and leisure. Lack of time and capacity were reported as primary reasons why many SMEs could not commit to participate in the reforms (see also Raggatt and Williams 1999 in relation to NVQs).

Fourth, Keep (2015b) argues that the challenge of involving employers, especially SMEs, in UK VQ reforms is exacerbated by employers' inability to organise themselves collectively to represent their interests across a sector or sub-sector. This challenge has been compounded by the collapse of multi-employer, industry level collective bargaining across the UK since the 1980s (Payne 2008). Attempts have been made in the past to organise the diverse range of employers through the establishment of a succession of UK Government funded bodies since the 1960s, but most of these bodies have been short lived and Keep (2007) claims that they were abolished once their usefulness to UK ministers had been exhausted. It has been argued that Industry Training Boards in the 1960s and the Manpower Services Commission in the 1970s failed to improve VET or strengthen the relationship between employers and trade unions (Finegold and Soskice 1988; King 1997; Keep 2006). The establishment of Training and Enterprise Councils in the late 1980s attempted to place greater ownership on employers for VET and indicated the neoliberal, market-driven views of the Conservative government at the time (King 1997). Yet, these councils were criticised for being unrepresentative of UK businesses, in particular SMEs, and for being delivery agents for government policy rather than employer-led bodies (Keep 2006). They were made up almost entirely of large employers with trade unions and other stakeholders, such as teachers and education professionals, having no place or statutory right of representation (Claydon and Green 1994; Busemeyer and Schlicht-Schmalzle 2014; Stuart 2019).

A more recent iteration of 'employer led' bodies – Sector Skills Councils – were established by the UK Government in 2002 to represent the interests of employers

stakeholders – that were expected to determine the skills, knowledge and understanding that would be contained in the 14-19 Diplomas.

across the UK (Gleeson and Keep 2004; Lloyd 2008; Ertl and Stasz 2010). Ertl and Stasz (2010) claimed that Sector Skills Councils and their established networks were a key link with employers during the development of 14-19 Diplomas. In contrast, Keep (2015a) and others (for example, Lloyd 2008; Payne 2008) have criticised Sector Skills Councils for being weak, poorly resourced, and unrepresentative of the views of employers (particularly SMEs) in their sector. Further, since 2016, Sector Skills Councils have not received a core UK Government grant and, instead, rely on generating their own income which has led to several ceasing to exist and those that still operate being significantly underfunded and under-resourced. Without strong employer organisations, governments across the UK are left to deal with individual employers which is time consuming, costly, and renders any collective action extremely difficult to engineer.

In Wales, the establishment of three Regional Skills Partnerships in 2016 (covering South East Wales, South West and Mid Wales, and North Wales) and a further Regional Skills Partnership in 2021 (to cover Mid Wales) are Welsh Government's most recent attempt to strengthen links with employers<sup>11</sup>. However, despite being touted as a vehicle for effective employer engagement, three separate Welsh Government initiated reports have questioned the effectiveness of Regional Skills Partnerships (Graystone 2018; National Assembly for Wales 2019; SQW 2019). The most recent, by the National Assembly for Wales (2019), recommended a thorough reform of Regional Skills Partnerships highlighting a need for a greater strategic focus, improved engagement with employers (particularly SMEs), and the need to work closely with industry representative bodies. Yet, whether Regional Skills Partnerships, each with an annual budget of approximately £160k, only two to three staff and a non-statutory

<sup>&</sup>lt;sup>11</sup> Regional Skills Partnerships are responsible for analysing labour market intelligence, engaging with regional employers and advising the Welsh Government on skills provision including apprenticeships and further education. In 2021, the Mid Wales Regional Skills Partnership was established separating it from the South West and Mid Wales Regional Skills Partnership that was established in 2016.

and entirely voluntary board can achieve these high government expectations is questionable.

A final broader challenge is that employers may not have the necessary curriculum and qualifications development expertise required to lead, or contribute significantly, to the development of VQs (Hodgson and Spours 2007; Huddleston and Branch-Haddow 2022). Huddleston and Laczik (2018), in their research focussed on 14-19 Diplomas, highlighted that the majority of employers interviewed for their research were unfamiliar with the technical requirements of qualifications development. Others (for example, Huddleston and Keep 1999) suggested that employers have a weak understanding of the education and qualification systems across the UK whilst Roe et al. (2006), when discussing NVQs, reported that employers have limited understanding of the qualifications which they were supposedly key in developing. In these examples, the reported lack of expertise from employers meant that other actors – usually from government bodies or awarding bodies – needed to step in and take a lead in the development process, which arguably restricted the influence that employers could exert during these reforms.

The challenges noted above are not intended to suggest that employers should not play an important role in the reform of VQs. Employers are a key link between VQs and the world of work, but the VET system is expected to serve a range of stakeholder interests, not just those of employers. Therefore, to place the responsibility for VQ reforms solely at the feet of employers (as they have in England) – who it has been argued have neither the capacity nor competence to take on such a role – is likely to lead to mixed results, as seen in previous UK reforms noted in this section.

As discussed in this section, there is an abundance of literature that explores the involvement of employers in VQ reforms in England but the same cannot be said about reforms in Wales. What requires further exploration is the extent to which employers have been involved in (and influenced) VQ reforms in Wales and whether employers have been given a central role, as they have in England. The next section explores the

involvement of teachers in past VQ reforms. What we see is that teachers (and others from learning providers) have experienced little involvement in reforms across the UK.

## 3.5. Teachers and the reform of VQs

The involvement of teachers and those from learning providers (for example, teachers, assessors and headteachers) is considered by some to be vital for the success of educational reforms (Swanepoel 2008; Fullan 2011; Schleicher 2011; Hargreaves and Fullan 2012; Grigg 2016). Indeed, the education literature makes several strong arguments, including the belief that it should lead to greater engagement and buy-in from teachers, lower levels of teacher resistance, education programmes and qualifications that are manageable to teach and qualifications that are informed by new and evolving knowledge (Kirk and MacDonald 2001; Berkovich 2011; Bathmaker 2013; Harris et al. 2017). Terhart (2013, p.487) argues that "you cannot achieve educational reforms against the will of teachers, but only with teachers" whilst Harris et al. (2017) claims that teachers are vital for lasting educational improvement. However, despite these strong views, it is the view of Coffield (2008; 2024) that, for many years, governments across the UK have implemented changes to VET and VQs without a significant attempt to involve the providers (and those who work within them) who offer VET/VQs.

Not everyone considers the involvement of teachers as beneficial for achieving the desired outcomes of national education reforms. For example, Tyack and Cuban (1997) and Spillane et al. (2002), writing over two decades ago, suggest that teachers participate in reforms in ways that are in line with their pedagogical views, values and experiences and may be unable to see the reforms through anything but the contextual lens of their subject and institution. Relatedly, Bjork (2003) notes that, despite efforts to involve teachers in educational reforms in Indonesia, teachers resisted their new role as they were unable to detach themselves from their socialised position within the hierarchical education system and/or they were unwilling or unable to commit time to participate in the reforms. Further, Smylie (1992) claims that teacher

expectations of what needs to be achieved in education reforms may be very different to that of politicians, policymakers and government bodies initiating the reforms and, as such, may act in ways converse to the aims of the reforms. But what might be argued is that such concerns should not preclude the involvement of teachers in education and qualification reforms as this negates a wealth of human capital and excludes those who arguably are best placed to contribute to lasting educational change (Lieberman et al. 2016; Harris et al. 2017).

The role of teachers in education and qualification reforms has been a subject of interest to researchers in the UK and internationally over the past 40 years, yet very few studies have identified the inclusion of teachers and learning providers in national VQ reforms across the UK. It has been suggested by some (for example, Hodgson and Spours 2003; Hodgson et al. 2004; Nuffield Foundation 2007) that the focus on employer involvement in VQ reforms in England has marginalised the voices of teachers. For example, the Nuffield Foundation (2007), in one of their issues papers that accompanied the Review of 14-19 Education and Training in England and Wales (Pring et al. 2009), were critical that the focus on employer involvement in the development of 14-19 Diplomas meant that the reforms almost entirely excluded the views of teachers. They argued that if teachers were better involved in the reforms, they could have provided valuable technical input and could have identified faults in the design and content of the qualifications.

Hodgson et al. (2004) made similar observations in their work on Curriculum 2000 reforms and claimed that UK Government policymakers, alongside awarding bodies, developed the qualifications without the input of those from learning providers. This led to school and college staff feeling like they had been "kept in the dark" and had not taken an active role in the reforms (Hodgson et al. 2004, p.449). It is examples such as these that led Coffield (2024) to assert that education policies are all too often developed by policymakers remote from the experiences of the classroom. Further, Bathmaker (2013), when discussing the inclusion of knowledge in VQs in England,

reported that the absence of practising teachers in the development process limited the possibilities for VQs to be informed by new and evolving knowledge.

In contrast, teachers in some other European countries have a voice in the development of VET policy. For example, in the German system, regional VET Boards – established by the Chambers of Commerce – comprise representatives of employers, employees, and *teachers* from vocational schools, an arrangement that is also in place on boards at Lander (state) and federal levels (Emmenegger et al. 2020). Similarly, in Denmark, teachers work with other actors such as trade unions, employer associations, and learners to govern the VET system and provide advice and recommendations to the Ministry of Education (Emmenegger and Seitzl 2020). Further, the established mechanisms and arrangements that are embedded in other countries – such as Austria, Switzerland, and Norway – provide teachers and VET providers with a seat at the table of VET policymaking (Gleeson and Keep 2004; Bosch and Charest 2008; Emmenegger and Seitzl 2020).

Despite the reported exclusion of teachers and learning providers in previous VQ reforms in England, some recent developments in Wales have placed teachers at the centre of education reforms. Teachers have been given a central role in developing the new Curriculum for Wales and the new GCSEs that are aligned to the new curriculum and there is some evidence that these efforts were a genuine attempt to include teachers (Crick and Priestley 2019; Crick and Golding 2020; Sinnema et al. 2020). However, these research findings are focussed on pre-16 school-based reforms in Wales, rather than vocational reforms. Again, as with other 'stakeholders' considered within this chapter, there appears to be a scarcity of literature and research that explores the involvement of teachers in vocational reforms. What we begin to understand is why – in contrast to other countries with long histories of social partnership – trade unions have played a minor role in vocational reforms across the UK.

### 3.6. Trade unions and the reform of VQs

Trade unions are considered by some to be an essential part of the economic and political landscape in Wales yet they play a marginal role in vocational reforms – as they do across the UK – when compared to countries such as Germany, Denmark, the Netherlands and Austria (Wales Centre for Public Policy 2019). As introduced in Section 3.2.2, Keep et al. (2010) argues that the dismantling of tripartite arrangements by the UK Government in the 1980s and 1990s and the subsequent weakening of trade union influence has led to their marginalisation in vocational reforms across the UK (see also Keep 2006; 2007; 2015b). Even before the Thatcher Conservative government took steps to sideline trade unions in the late 1980s and early 1990s, Woodall (1986) argued that trade unions in the UK had limited influence on government VET policy compared with trade unions in other European countries, as has been noted above. This is not dissimilar to other liberal market economies – such as the USA, Canada and Australia - where weak institutionalisation has meant that there is a limited role for trade unions in the development of VET policy (Cooney and Stuart 2012; Stuart and Huzzard 2017; Fortwengel et al. 2019; Stuart 2019; Vossiek 2019). By the early 1990s, the influence of trade unions in UK political life was weaker than any time since the Second World War (Keep et al. 2010). Young and Hordern (2022) claim that the role of trade unions has been restricted largely to work conditions and wage bargaining at an organisational level albeit with a role at a workplace level through Union Learning Funds (which continue in Wales but ceased in England in 2021), compared with their prominent role in some other countries discussed below (see Stuart and Huzzard 2017).

The industrial relations literature is heavy with discussions about the prominent role of trade unions in the VET systems in countries with strong histories of social partnership, particularly those with collective skill formation systems (see, for example, Bosch and Charest 2008; Saniter and Deitmer 2013; Emmenegger and Seitzl 2020; Emmenegger et al. 2020). In these countries, social partnership arrangements are in place to provide a platform for the involvement of trade unions in the development of VET policy (Cooney and Stuart 2012; Saniter and Deitmer 2013; Emmenegger et al. 2020;

Emmenegger and Seitzl 2020). For example, as noted earlier in this chapter (Section 3.2.3), in Germany, trade unions have some of the strongest rights in the world in relation to VET and several studies focussed on the German system highlight the active role of trade unions, and their collaborative role with employers and other actors (for example, Culpepper 2007; Bosch and Charest 2008; Culpepper and Thelen 2008; Trampusch 2009; 2010; Lansbury 2015; Keller and Kirsch 2021). Emmenegger et al. (2019) argue that the German VET system provides a strong and more equal role for trade unions in VET governance with trade unions having a legal responsibility to appoint individuals to VET boards at regional, Land (state) and federal levels – boards that have a key role in maintaining the consensus principle that is vital for the VET system in Germany.

Similarly, in Austria, trade unions are involved in the development of VET policy (Trampusch 2010; Durazzi and Geyer 2020). There is also relative consensus between trade unions and SMEs who are the backbone of the Austrian economy and are the dominant actors in shaping VET policy (Trampusch 2009; 2010; Lansbury 2015; Durazzi and Geyer 2020). Norway also has a strong history of social partnership and collaboration between the social actors involved in the VET system. For example, the collaboration between trade unions, employer associations and government was a key contributing factor during the implementation of 'Reform 94' which fundamentally restructured the VET system in Norway (Payne 2006; Lansbury 2015). Further, in Denmark, trade unions represent the interests of individuals and Bosch and Charest (2008) claim that they have an even greater influence than they do in Germany. For example, trade unions, alongside employer associations, are represented on management boards of local vocational schools and have a role in appointing the director of the institutions (Bosch and Charest 2008).

The relative strengths of collective skill formation systems are rehearsed earlier in this chapter (Section 3.2.3), and it is claimed by Emmenegger et al. (2020) and others (for example, Bosch and Charest 2008; Busemeyer and Trampusch 2012; Emmenegger and

Seitzl 2020) that key to the strength of these systems are the high levels of cooperation between social partners and the emphasis on consensus rather than conflict (especially between employer associations and trade unions). Yet, it should be remembered that there are variations between collective systems and that, although trade unions are key actors in the governance of VET in all these systems, their platform to influence does vary. For example, Emmenegger and Seitzl (2020) suggest that trade unions in Switzerland have a limited role in the governance of the VET system compared with Germany. Trade unions are involved in the governance of the VET system at a federal level in Switzerland, but primarily as 'veto players' in a system that is largely dominated by the voices of employers. As a result, Emmenegger et al. (2020) and Dionisius et al. (2009) claim that this has important consequences for apprentices and employers offering apprenticeships; in Germany, given the active involvement of trade unions in the governance of VET, apprentices attend more school-based (off the job) training, spend less time on productive tasks, and earn higher salaries than their Swiss counterparts. Relatedly, German employers carry a larger share of training costs than they do in Switzerland (Dionisius et al. 2009).

As introduced in Section 3.3, there appears to be an intent from the Welsh Government to involve trade unions in political life by adopting some type of social partnership model in Wales, as well as continuing with the Wales Union Learning Fund (compared with its removal in England). The introduction of the Social Partnership and Public Procurement Act in 2023 and the establishment of a Social Partnership Council for Wales to support the implementation of the Act is a notable step to embed the Welsh Government's social partnership ambitions in law (Welsh Government 2023b). However, there is no explicit mention of VET or the role of trade unions in education and training within the Act. Therefore, despite the Social Partnership and Public Procurement Act representing progress in terms of setting the Welsh Government's political intent in legislation and formalising the role of trade unions, the extent to which trade unions are (or are likely to be) involved in the VET system in Wales is opaque.

Again, as with other 'stakeholders', the involvement (or non-involvement) of trade unions in VQ reforms in a UK context has focussed primarily on England. Therefore, what is not properly understood, given the Welsh Government's social partnership ambitions, is the extent to which the mechanisms and arrangements necessary to involve trade unions in the reform of VQs are in place in Wales and/or are working effectively. The next section explores the involvement of learners in VQ reforms. What we begin to understand is why – despite the political intent placing them at the heart of the education system in Wales – learners have been overlooked in previous VQ reforms across the UK since the 1980s.

### 3.7. Learners and the reform of VQs

Over the past 20 years the political intent in Wales has been to involve learners in the decisions that affect them in their education at local, regional and national levels. The Welsh Government's 2004 adoption of the principles from the United Nations Convention of the Rights of the Child – the first UK country to do so – set the foundations for the Welsh Government's commitment to children's rights. This led to notable steps in educational policy and legislation such as the 2005 law for all schools to have a school council, the requirement for learning providers in Wales to have a formal learner involvement strategy, the establishment of a Children's Commissioner for Wales and the focus on children's rights in the Curriculum and Assessment (Wales) Act 2021 (Estyn 2019; Welsh Government 2022a). Therefore, the political intent in Wales since devolution has been to place learners at the heart of the education system, which is reinforced by the notions that are espoused by the Welsh Government and education bodies such as Qualifications Wales, Estyn and Medr (Welsh Government 2010; 2022a; Estyn 2023; Medr 2024; Qualifications Wales 2023b).

There are many reasons why the involvement of learners in VQ reforms is considered important. International research across the UK, US and Australia has identified the benefits of involving learners in educational reforms. These include improved engagement, motivation, agency and confidence, stronger relationships with teachers and providers, lower levels of poor discipline and improved academic achievements (Fielding and Bragg 2003; Mitra et al. 2011; Angus et al. 2013; Flynn 2013; 2014; Baroutsis et al. 2016a; 2016b; Mitra 2018; Flynn and Hayes 2021). Cook-Sather (2002, p.10) suggests that including learners in the decisions that affect them leads to young people who are more engaged and are more likely to take responsibility for their education as "it is no longer something being done to them but rather something they do". Similarly, Elwood (2012) argues that learners are impacted the most by qualification reforms and, as such, should have an active role in the development of qualifications and assessments. Specific to Wales, research commissioned by the Welsh Government (2010) indicates that involving learners in their education is beneficial for individuals, teachers and learning providers. It is claimed that involvement in the decisions that affect them can support learners' self-esteem, motivation and can help them to gain important personal, social and organisational skills. However, most of these claims are made through the lens of involvement at a school/college level and far less is known from the literature about learner involvement in national reforms, particularly VQ reforms.

There are also challenges to learner involvement in educational reforms. Cook-Sather (2006; 2018) argues that, similar to employers, there is often a presumed view (primarily from policymakers and government bodies across the UK) that there is a single learner voice that captures the varied views and interests of learners. Yet, learners are a transient and heterogenous group with a vast range of interests and reasons for studying VQs (Cook 2002; Bragg 2007; Billett 2011; Angus et al. 2013). Brand (1998), writing over 25 years ago but whose views remain highly relevant, argues that the challenge of capturing a collective learner voice is exacerbated as learners are generally not organised collectively and, therefore, cannot present a unified position to support or oppose developments. There is also the question of how to include a broad range of learners in the reform process and avoid a "tokenistic, unrepresentative and unengaging" approach to capturing the views and opinions of learners (Cook 2002, p.521). Involving learners in the reform of VQs is, therefore, a challenging task

that requires extensive thought to ensure that the views of what is a diverse group are sufficiently considered.

Despite the suggested benefits of involvement, it seems from the literature that learners have been sidelined in previous qualification reforms across the UK (Angus et al. 2013; Elwood 2012; 2013). For example, Elwood and Lundy (2010) argue that in England a key area of education in which learner views are less likely to be sought are examinations and qualifications. Indeed, examples of meaningful engagement with learners in qualification reforms in the UK are rare, with Elwood (2012) claiming that qualifications reform seems to be an area of education policy where learners have been least consulted in the decisions that affect them. The focus on involving other actors, particularly employers, has arguably marginalised the views of learners (Elwood and Lundy 2010; Elwood 2012; 2013). As such, it is the opinion of Levin (2000) and Angus et al. (2013) that policymakers across the UK have taken the view that they know what is best for learners and this view has been shared by each level in the hierarchy of policy development. At the bottom are learners – they are the least powerful group of stakeholders and are the recipients of the decisions made by those above with limited influence over the decisions made.

Some studies have explored learners' views and experiences of qualifications and assessments in England (Baird et al. 2011), Wales and Northern Ireland (Barrance and Elwood 2018; 2020), as well as the Republic of Ireland (Baird et al. 2014; Elwood et al. 2017). However, the focus of most of these studies was on general qualifications (GCSEs and A levels in Wales, England and Northern Ireland and the Leaving Certificate in the Republic of Ireland), rather than VQs (albeit Baird et al. 2011 did capture the views of learners on the development of 14-19 Diplomas alongside changes to GCSEs and A Levels). Further, although these studies identified that learners were consulted on some decisions that affect them at an institutional level, it is claimed by Elwood (2012) that learners have been excluded from the higher levels of decision making such as national qualification reforms. Overall, the evidence indicates only partial

involvement of learners in matters relating to qualifications and assessment, but what evidence is available suggests positive outcomes.

# 3.8. Conclusion

This chapter has explored (and assessed) the literature on the involvement of stakeholders in the reform of VQs. The evidence – in a UK context – draws our attention to the uneven and unequal involvement of stakeholders in past UK vocational reforms. For example, the involvement and influence of employers and central governments have increased whilst teachers and trade unions have seen a gradual decline. Other countries – particularly those with so-called collective skill formation systems (such as Germany, Austria, the Netherlands and Switzerland) – have established social partnership arrangements in place and involve a range of other actors in vocational reforms. The evidence suggests positive links between social partnership involvement and the strength of their VET systems.

There are claims that Wales has diverged from England (in terms of being more collaborative in their approach and having legislated social partnership ambitions) but the extent to which Wales has actively diverged from England (beyond rhetoric) is open to question. Most of the UK literature has focussed on England and there is scarcity of literature that explores the involvement of stakeholders in qualification reforms in Wales, particularly VQ reforms. This thesis will go some way towards addressing this and better understanding if/how stakeholders contribute to, and influence, the process of reforming VQs.

# 4.1. Introduction

A comprehensive methodology chapter is considered essential for ensuring transparency in the research process (Hammersley and Atkinson 2007). This chapter begins by outlining the overall research aim and questions before discussing the epistemological and ontological positions taken. Second, the research design including the use of semi-structured interviews is explained and justified, and the research sample and recruitment of participants is outlined. Third, the process of data collection and analysis is detailed. Fourth, the ethical considerations and data security arrangements are discussed before reflecting on my position as an 'insider' in the research process.

# 4.2. Research aim and questions

This study aims to provide an insight into the *extent of stakeholder involvement and influence in the reform of VQs in Wales*, using as its focus the first programmes of VQ reform – in the HSCC and CBE sectors – undertaken by Qualifications Wales. The focus of this thesis derives from my role as a senior manager at Qualifications Wales and, therefore, an 'insider' to this research (discussed in Section 4.9) as well as my previous experience of working in roles relating to VQs over the past 15+ years. The methodology outlined in this chapter provides a rigorous and ethical design for the collection and analysis of data to address the overall research aim and to specifically address the following research questions (as outlined in Chapter 1):

RQ1. In what ways were stakeholders involved in, and influenced, the sector reviews of VQs in the HSCC and CBE sectors in Wales?

- RQ2. In what ways were stakeholders involved in, and influenced, the process of developing approval criteria for new VQs in the HSCC and CBE sectors in Wales?
- RQ3. What explains any differences in stakeholders' involvement and influence?

## 4.3. Epistemological and ontological position

When developing the research design for this study, it was important to consider the philosophical principles and theoretical assumptions that shaped my understanding of the world and the way that knowledge is formulated. Epistemology is a theory of knowledge and is driven by questions such as 'what is knowledge?', 'what can we know?' and 'how do we know what we know?' (Greco 2017, p.1). Ontology is a theory of the nature of social entities and it is concerned with "the question of whether social entities can and should be considered objective entities that have a reality external to social actors or whether they can and should be considered social constructions built up from the perceptions and actions of social actors" (Bryman 2016, p.28). A philosophical position inevitably shapes how a research problem is understood and the choice of research design used to address the problem. The research design and the methods used cannot, according to Hughes and Sharrock (1998), be divorced from a researcher's philosophical position and their version of how they see the world. Therefore, it was important that I located my research within a clear research paradigm.

In educational research the term paradigm is used to describe a researcher's 'worldview' (Mackenzie and Knipe 2006). This worldview or framework is a basic set of beliefs that guides research and practice in a field (Guba and Lincoln 1994; Willis 2007). It is the lens through which a researcher looks at the world and examines the methodological aspects of their practice to determine the research design and methods that will be used and how the data will be analysed. The choice of research paradigm has significant implications for every decision made in the research process, including the choice of methodology and methods (Kivunja and Kuyini 2017).

There has been longstanding debate amongst educational researchers about the value and validity of philosophical paradigms. Sometimes referred to as the 'paradigm wars' (Hammersley 1992), with interpretivism and positivism placed in opposite corners of the debate, there has been longstanding conflict between two incommensurable paradigms in terms of their appropriateness for conducting educational research. Broadly, positivism is based on the belief that knowledge can be obtained through objective observations and measurements (Alharahsheh and Pius 2020) compared with interpretivism that sees the reality of the situation as socially constructed and interpreted by individuals based on their experiences and understood subjectively (Kroeze 2012).

This study adopts an epistemologically interpretivist position in line with a subjectivist ontological frame. An interpretivist position views the research through the lens of "participants' views of the situation being studied" (Creswell 2003, p.8). Although criticised for its subjectivist notions and beliefs (Hammersley 2013), an interpretive approach attempts to build knowledge through the exploration and understanding of the unique views and perspectives of individuals and the meaning attached to those viewpoints (Creswell and Poth 2018). It aims to understand the subjective world of human experience and to understand the viewpoint of the subject being observed, rather than the viewpoint of the observer (Guba and Lincoln 1989). It is therefore appropriate for this study on stakeholder inclusion/exclusion that it seeks to explore and understand the experiences and views of participants in the reform process. Further, a subjective ontological frame considers that context has a significant influence over shaping the experiences of individuals (Hiller 2016). This aligns with a research design that analyses and compares VQ reforms in two different employment sectors. This subjectivist approach allows for the sectoral context and differences to be drawn out when exploring and contrasting how a stakeholder perceived their inclusion/exclusion and influence in the process of reforming VQs.

Willis (2007, p.90) asserts that interpretivists tend to favour qualitative methods, a view that is widely supported by others (for example, Nind and Todd 2011; Silverman 2021; Pervin and Mokhtar 2022). It is claimed that qualitative research often provides detailed information and data to support the understanding of social contexts. McQueen (2002, p.55) claims that "interpretivist researchers seek methods that enable them to understand in depth the relationship of human beings to their environment and the part those people play in creating the social fabric of which they are a part." Despite the widespread use of qualitative research, there are limitations to the approach. For example, qualitative research and the data it generates can be complex and time consuming to collect, analyse and interpret; the small sample size within most qualitative studies leaves results that can only be generalised to the larger population in a limited way; it can be subjective to bias from researchers and participants; and the focus on meanings and experiences can sometimes omit contextual sensitivities (Flick 2014; Mwita 2022).

Nevertheless, despite these limitations, a qualitative approach was best suited for this study due to its appropriateness for gathering 'rich' and 'in depth' accounts of the phenomenon under investigation, particularly when focussed on understanding the experiences of individuals or groups (Pervin and Mokhtar 2022). Indeed, Myers (1997, p.6) argues that "the motivation for doing qualitative research, as opposed to quantitative research, comes from the observation that, if there is one thing which distinguishes humans from the natural world, it is our ability to talk!" Qualitative research methods, therefore, support researchers to study and better understand the views and perspectives of people and the social and cultural contexts within which they live. Hence, a qualitative approach was best suited for this study given the focus on understanding the views, perceptions and experiences of those who were included/excluded and influenced the process of reforming VQs in Wales. For this purpose, using a quantitative approach – which centres on numbers and measurement instead of words – was unlikely to generate the necessary insight and depth that can be generated by qualitative research.

### 4.4. Research design

The research design utilised a comparative case study approach using two different VQ reforms (cases) in the HSCC and CBE sectors. A case study approach focusses on an "in-depth study of one or a limited number of cases" (Tight 2017, p.6) and it allows for the use of a wide range of data and evidence to explore particular cases or phenomenon (Yin 2014). Although there are debates about the appropriateness and credibility of case studies in qualitative research and criticisms of the inconsistent approach taken by researchers (see Meyer 2001; Tight 2009; Thomas 2011), Hyett et al. (2014) claim that case studies have been unnecessarily devalued by comparisons with statistical methods and failures to recognise the strengths of the approach. Indeed, there are several benefits to a case studies approach that makes it appropriate for this study. Firstly, the in-depth nature of case studies means that it can generate rich and insightful data on particular phenomena under investigation (Yin 2014). Secondly, case studies allow for the inclusion of multiple perspectives and experiences from a range of stakeholders/participants (Moriarty 2011). Thirdly, it provides substantial flexibility in terms of what data is collected and the ways that it is collected (Stake 1995). Finally, more than one case can be examined, thereby providing opportunities to compare and contrast (Bartlett and Vavrus 2016). Therefore, selecting a case studies approach allows for the comparison of two different sectors (cases) in order to draw out specific contextual differences whilst focussing on the overall aim of exploring the extent of stakeholder involvement and influence in the process of reforming VQs in Wales.

Case study research can involve a range of methods such as interviews, questionnaires, focus groups, documentary analysis and observations. Although there are benefits to other methods, the in-depth and rich data that can be generated from interviews, alongside the flexibility of the approach, make it appropriate for this study because it meant that the views of those who were included/excluded in the reforms could be captured. For example, data generated from questionnaires may provide some level of

self-assessment of involvement but would not provide the depth and richness that can be provided through interviews (Bell 1999). Indeed, interviewing can gain insight into the interviewee's world and their views, perceptions and experiences (Bradford and Cullen 2012; Flick 2014).

There are three approaches to interviewing – structured, semi-structured and unstructured. A structured interview allows very little room to deviate from the interview questions whereas unstructured interviews are free flowing and can go in a range of directions that deviate from the intended subject (Palmer and Bolderston 2006). In between is the semi-structured interview which provides an element of structure whilst providing flexibility for the researcher to capture rich and in-depth data and to explore unexpected topics which only became apparent during interviews (Bell 1999; DiCicco-Bloom and Crabtree 2006; Flick 2014).

This study adopts a qualitative approach using a series of online semi-structured interviews. Online interviews were selected for three primary reasons. Firstly, during the planning stage of the research, the university had suspended in person interaction with research participants in response to the COVID-19 pandemic. Although some of the restrictions had been relaxed by the time of the data collection, all the planning (including selecting the sample) was based on the assumption that in-person methods would not be permitted. Secondly, my organisation had a 'work from home' policy in place during the period of data collection. Accepting that I was not conducting this research on behalf of my organisation, it nevertheless was appropriate that I followed the policy in place by my employer. Thirdly, online interviews offered several advantages over in-person interviews. It removed the geographical barriers associated with conventional in-person interviewing which meant a greater number of participants could be included in the sample. It was an efficient and cost-effective way of conducting interviews (James and Busher 2016; Gray et al. 2020) which was an important consideration as a part-time doctorate student. Finally, the convenience of

online interviews for participants, particularly given the heightened health concerns at the time, may have increased their willingness to be interviewed.

However, there were, potentially, disadvantages to using online interviews compared with traditional in-person interviews. Abidin and De Seta (2020, p.9) argue that online interviewing can often cause "anxieties, challenges, concerns, dilemmas, doubts, problems, tensions, and troubles" due to perceived difficulties around managing the interactions and generating meaningful conversations. In an online interview, researchers may not be able to observe and respond to body language and emotional cues (Cater 2011). Moreover, online interviews presented potential technical challenges with the risk of poor internet, power outages and failing technology amongst some of the potential difficulties (James and Busher 2016). For example, in one interview there were technical challenges whereby, due to poor internet connection, the participant needed to turn off their camera. Although this only happened in one interview it did impact the rapport that I could develop with the participant and meant that I could not observe their facial expressions. Nevertheless, despite technical challenges in a minority of interviews, using online interviews was the most suitable approach for this research.

## 4.5. Research population and sample

The research population for this study was individuals involved in the HSCC and/or CBE reforms and those that are considered representatives of key actors in the VET system in Wales that could contribute to addressing the research questions. One group of stakeholders that were not included in the research design were learners. As an 'insider' I was aware that learners had not been widely involved in the VQ reforms under investigation and, therefore, I could not access contacts for learners through my colleagues at Qualifications Wales. I was also mindful of the reported difficulties of involving learners, who are a transient and disparate group, in past research studies (Elwood and Lundy 2010; Elwood 2012; 2013) and the difficulties of identifying and

including a sample that would represent the types of learners studying HSCC and CBE qualifications. Further, I was conscious of the need to keep the research design (and the sample) manageable. Including a sufficient sample of learners that would represent the individuals studying across different educational settings would have required a much larger sample and would have been excessively time-consuming. The exclusion of learners is a limitation of this study and could be considered a missed opportunity.

Sampling is an essential stage in the qualitative research process (Onwuegbuzie and Leech 2007). Indeed, deciding on a suitable sample, particularly when conducting qualitative research, is arguably as important as the decisions made in relation to data collection and analysis. Sampling refers to the process of selecting subjects to take part in a research investigation on the grounds that they provide information and evidence considered relevant to the research problem (Oppong 2013). Quantitative studies often focus on the need to select a sample that is representative and has a direct bearing on the validity, reliability and generalisability of the research. In contrast, when conducting qualitative research – where it is not usually possible to include all members of a target population (for example, teachers) – an effective sampling strategy is needed to include a subset of a particular population (Mack et al. 2005). Marshall (1996) claims that there is no perfect way to select a truly representative sample whilst Suri (2011) calls for a flexible and pragmatic approach to sampling for qualitative research. Therefore, accepting that no sample is 'perfect' (Marshall 1996), it was important that the sample was robust yet manageable.

A purposive sampling strategy was used to identify participants "who will provide the best perspectives on the phenomenon of interest, and then intentionally invites those specific perspectives into the study" (Abrams 2010, p.538). In January 2021, I conducted an initial mapping exercise to identify participants who could share information, views and opinions to address the research questions. I consulted with those who managed the HSCC and CBE reforms at Qualifications Wales to identify relevant participants. This included those actors who were involved in the HSCC and/or CBE reforms, and those

who were not but, from the policy and literature reviews, were identified as key stakeholders in the VET system in Wales. The sample size was also influenced by what was considered manageable in terms of the size and scope of the study and the length of time required to undertake the data collection and analysis.

From the mapping exercise a potential 36 participants were identified who could contribute to the research. The number of interviewees was extended by a 'snowball' sampling approach (Bryman 2016) as some participants recommended others within their organisations or additional stakeholders who could contribute to the research. In total, 52 participants were interviewed for this research. The details of the participants, including pseudonyms, stakeholder type, job role and a rationale for their inclusion in the sample are included in Tables 4-11. The tables are separated by stakeholder types: representatives from Qualifications Wales involved in the management and leadership of the reforms (Table 4), Welsh Government civil servants responsible for post-16 funding and apprenticeship policy (Table 5), employers including large employers and SMEs (Table 6), teachers/lecturers and representatives from learning providers (Table 7), key individuals from sector bodies (Table 8), awarding bodies responsible for developing the new HSCC and CBE qualifications (Table 9), Regional Skills Partnerships (Table 10), and education/trade unions (Table 11).

Qualifications Wales						
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion		
Angela	Qualifications Wales	Senior Manager	Both	Led elements of the HSCC and/or CBE sector reviews and/or development of approval criteria.		
Dafydd	Qualifications Wales	Senior Manager	Both			
Katie	Qualifications Wales	Senior Manager	Both			
Martyn	Qualifications Wales	Manager	Both	Managed elements of the HSCC and/or CBE sector reviews and/or development of approval criteria.		
Bethan	Qualifications Wales	Manager	Both			
Chris	Qualifications Wales	Manager	CBE <sup>12</sup>			

Table 4 - Research sample - Qualifications Wales representatives

<sup>&</sup>lt;sup>12</sup> This individual joined Qualifications Wales following the HSCC reforms and, therefore, only managed elements of the CBE reforms.

Welsh Govern	Welsh Government				
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion	
James	Welsh Government	Senior Manager	Both	Responsible for post-16 funding at Welsh Government and attended stakeholder events held by Qualifications Wales during the HSCC and CBE reforms.	
David (Joint interview with Aled)	Welsh Government	Senior Manager	Both	Responsible for apprenticeship policy at the Welsh Government and attended Qualifications Wales' stakeholder events during the HSCC and CBE reforms.	
Aled (Joint interview with David)	Welsh Government	Manager	Both	Manages apprenticeship policy at the Welsh Government.	

Table 5 - Research sample - Welsh Government civil servants

Employers	Employers			
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion
Katie	Employer A	Manager	HSCC	Manager at a local authority responsible for managing care homes. Involved in HSCC reforms.
Janet	Employer B	Manager	HSCC	Responsible for learning and development at a SME providing independent living support. Involved in HSCC reforms.
Karen	Employer C	Manager	HSCC	Responsible for learning and development at a SME providing independent living support for vulnerable adults. Involved in HSCC reforms.
Tony (Joint interview with Cathy)	Employer D	Assistant Manager	HSCC	Assistant Manager at a SME providing social care support to adults. No involvement in HSCC reforms.
Cathy (Joint interview with Tony)	Employer D	Manager	HSCC	Manager at a SME providing social care support to adults. No involvement in HSCC reforms.
Vanessa	Employer E	Senior Manager	HSCC	Responsible for learning and development at a large independent living housing organisation. No involvement in HSCC reforms.

Jonathan	Employer F	Senior Manager	CBE	Senior Manager at a SME and a member of Qualifications Wales' Stakeholder Advisory Group (SAG) in the CBE reforms.
Dewi	Employer G	Senior Manager	CBE	Senior Manager at a micro business and a member of Qualifications Wales' SAG in the CBE reforms.
Ricky	Employer H	Senior Manager	CBE	Senior Manager at a SME. Recommended for inclusion by another employer. No involvement in the CBE reforms.
Mari	Employer I	Manager	CBE	Manager at a large multi- national employer. Involved in the CBE reforms.

Table 6 - Research sample - Employers

Learning pro	Learning providers and learning provider representative bodies			
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion
Garyn	FE College A	Curriculum Manager	HSCC	Responsible for HSCC department at the college. Involved in the HSCC reforms.
Stephanie	FE College B	Curriculum Manager	HSCC	Responsible for HSCC department at the college. Involved in the HSCC reforms.
Rhys	FE College C	Senior Manager	CBE	Responsible for quality and curriculum. Member of ColegauCymru's Curriculum & Quality (C&Q) Group. Involved in the CBE reforms.
Gavin	FE College D	Curriculum Manager	CBE	Responsible for CBE department at the college and a member of the BACH Network. Involved in the CBE reforms.
Eteeq	Secondary School A	Teacher	CBE	Teacher delivering CBE qualifications. Attended Qualifications Wales' events to develop level 2 qualifications.
Oliver	Secondary School B	Teacher	CBE	Teacher delivering CBE qualifications. Attended Qualifications Wales' events to develop level 2 qualifications.
Rebecca	HE Institution A	Lecturer	HSCC	Lecturer in nursing. Member of Social Care Wales' (SCW) Qualifications and Standards

				Advisory Group. Involved in the HSCC reforms.
Gary	HE Institution A	Lecturer	CBE	Senior lecturer in architectural technology. No involvement in the CBE reforms.
Victoria (Joint interview with Ruth)	ColegauCymru	Senior Manager	Both	Responsible for representing FE colleges across Wales.
Ruth (Joint interview with Victoria)	ColegauCymru	Senior Manager	Both	Responsible for representing FE colleges across Wales.
Richard (Joint interview with Hillary)	NTFW	Senior Manager	Both	Responsible for representing independent WBL providers across Wales.
Hillary (Joint interview with Richard)	NTFW	Manager	Both	Responsible for representing independent WBL providers across Wales.

Table 7 - Research sample - Learning providers

Sector bodies	Sector bodies			
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion
Greg	Social Care Wales	Senior Manager	HSCC	Led elements of the stakeholder engagement to develop the content of HSCC qualifications.
Emily	Social Care Wales	Manager	HSCC	Developed the content of HSCC qualifications. Member of Qualifications Wales' SAG in the HSCC reforms.
Eleri	Social Care Wales	Consultant	HSCC	Consultant that supported Social Care Wales to develop the content of HSCC qualifications. Member of SCW's Qualifications and Standards Advisory Group.
Pamela	Health Education and Improvement Wales (HEIW)	Manager	HSCC	Developed the content of HSCC qualifications. Member of Qualifications Wales' SAG in the HSCC reforms.
Michael	Play Wales	Manager	HSCC	Member of Qualifications Wales' SAG in the HSCC sector review.
Siân	Employer representative organisation	Policy Adviser	HSCC	Policy Adviser representing 450+ care homes, nursing homes and other independent health and social care providers across Wales. Involved in the HSCC reforms.

Mathew	Construction Training Industry Board (CITB)	Senior Manager	CBE	Worked with Qualifications Wales during the reforms. Member of Qualifications Wales' SAG in the CBE reforms.
Mohamad (Joint interview with Catherine)	Electrical Contractors' Association	Senior Manager	CBE	Worked with Qualifications Wales during the reforms and encouraged their members to participate. Member of Qualifications Wales' SAG in the CBE reforms.
Catherine (Joint interview with Mohamad)	Electrical Contractors' Association	Manager	CBE	Encouraged their members to participate in the CBE reforms. Member of Qualifications Wales' in the CBE reforms.
Michelle	Construction Skills Certification Scheme	Manager	CBE	Responsible for the Construction Skills Certification Scheme in Wales. Member of Qualifications Wales' SAG in the CBE reforms.

Table 8 - Research sample - Sector bodies

Awarding bodies				
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion
Robert	City & Guilds	Senior Manager	Both	Involved in both reforms as the awarding body contracted to develop new HSCC and CBE qualifications.
Philip	City & Guilds	Manager	HSCC	Responsible for managing the development of HSCC qualifications.
Hugo	EAL	Manager	CBE	Responsible for managing the development of CBE qualifications.

Table 9 - Research sample - Awarding bodies

<b>Regional Skills</b>	Regional Skills Partnerships				
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion	
Mark	Regional Skills	Manager	HSCC	Manager responsible for the	
(Joint interview with Steve)	Partnership A			HSCC sector.	
Steve	Regional Skills	Manager	CBE	Manager responsible for the	
(Joint interview with Mark)	Partnership A			CBE sector.	

Table 10 - Research sample - Regional Skills Partnerships

Trade/Educatio	Trade/Education unions				
Pseudonym	Stakeholder type	Job role	Sector	Rationale for inclusion	
Ronald	Trade Union A	Policy Officer	HSCC	Responsible for supporting	
(Joint interview				members in the HSCC sector	
with Melissa)				in Wales. No involvement in	
				the reforms.	
Melissa	Trade Union A	Policy Officer	Both	Responsible for supporting	
(Joint interview				members in Wales. No	
with Ronald)				involvement in the reforms.	
Colin	Trade Union B	Policy Officer	CBE	Responsible for supporting	
				members in the CBE sector in	
				Wales. No involvement in the	
				reforms.	
James	Education Union A	Policy Officer	Both	Responsible for supporting	
				members in Wales.	
Carys	Education Union B	Policy Officer	Both	Responsible for supporting	
				members in Wales.	
Geoff	Wales TUC	Policy Officer	Both	Responsible for TUC policy in	
				Wales. No involvement in the	
				reforms.	

Table 11 - Research sample - Education/Trade unions

## 4.5.1. Gaining access to participants

Access can be one of the most challenging aspects of conducting social research. Van Maanen and Kolb (1982, p.14) write that access is "not a matter to be taken lightly but one that involves some combination of strategic planning, hard work and dumb luck". Despite the potential challenges, as an 'insider', it was relatively straightforward to gain access to most participants included in the sample because they had been involved in the HSCC and/or CBE reforms and/or I had worked with some of them in the past on other pieces of work unrelated to this research. For those who had been involved in the HSCC and/or CBE reforms I was introduced to them by colleagues at Qualifications Wales. It proved more challenging and time consuming to access stakeholders who had not been involved in the HSCC and/or CBE reforms I (for example, sector trade unions). To access these stakeholders, I asked other relevant participants if they could recommend and make an introduction. For example, a participant from TUC Wales introduced me to relevant individuals at sector trade unions who agreed to participate in the research. This did

not impact the overall sample, but it did mean that it was more time consuming to access some of these participants.

Once the sample had been identified, the primary approach was to send an email invitation (Appendix 2) that included an information sheet outlining the purpose of the research and in what ways they were being asked to participate (Appendix 3). If they agreed to participate, a mutually convenient date and time was agreed for the interview to be conducted. This approach proved to be successful as only one individual identified for inclusion in the sample chose not to participate.

## 4.6. Research process and data collection

Table 12 shows the timeline of the research project from the identification of the research sample through to the data analysis. Interviews were conducted between June and September 2021. As a fluent Welsh speaker and familiar with conducting bilingual interviews, I conducted one interview in Welsh (at the request of the participant) with all others in English. Seven interviews were joint interviews with two participants from the same organisations (see Tables 4-11). Although I did not set out to conduct joint interviews, in all seven cases participants on the sample list advised there was another individual at their organisation who could also contribute to the research. It was agreed that to avoid overlap both participants would be interviewed together.

Timeline	Activity
February 2021	Identified research sample
March – May 2021	Developed interview schedules
May 2021	Ethical approval from Cardiff University's School of
	Social Sciences Ethics Committee
May 2021	Piloted interview schedules with x2 participants
June – September 2021	45 semi-structured interviews with 52 participants
September 2021 – April 2022	Transcription of interview audio recordings
April – July 2022	Thematic analysis of interview transcripts

Table 12 - Methodology timeline

#### 4.6.1. Designing interview schedules

The first stage of data collection involved the development of suitable interview schedules outlining the interview questions, areas of focus and helpful prompts that could be used during interviews. Drawing on my previous experience of conducting research projects in my role at Qualifications Wales, I designed the interview schedule to best address the overall research questions. A range of question types were developed including a selection of introductory questions and open-ended questions as advised in the literature (Kvale 1996; Kvale and Brinkmann 2009). Interview questions were carefully designed to elicit an open dialogue and to provide a structure to the interview without preventing alternative avenues of inquiry being explored. Room was left in the schedule for participants to talk openly about their experiences of being involved in the HSCC and/or CBE reforms.

The interview schedule started with a very open question of 'please tell me about your role at your organisation and your role, if any, in the reform of VQs in the HSCC and/or CBE sectors?' This question was important to ask in order to initially identify whether they had been involved in either of the reforms and the extent of their involvement. It meant that I could select relevant questions from the interview schedule depending on their response to the first question. The questions that followed were separated into three key themes to align with the overall research questions and to aid the flow of the interview as advised in the literature (Kallio et al. 2016; Naz et al. 2022) (Appendices 5 and 6). The first theme focussed on stakeholder involvement and influence in the HSCC and/or CBE sector reviews; the second theme on involvement and influence in the process of developing approval criteria for new VQs in Wales. Separating the questions into themes was important as I was seeking to gather data on both the sector review element of the reforms and the process of developing approval criteria for new VQs. Given the potential for participants to discuss their

experiences in both stages interchangeably it proved an effective way of separating the two stages whilst not hindering the openness and flow of discussions.

Two versions of the interview schedule were developed – one for Qualifications Wales staff who had significant involvement in the reforms under investigation and the other for participants external to Qualifications Wales. Both versions of the schedule included very similar questions, based on the three themes outlined above, but the version for Qualifications Wales staff had some additional questions (for example, 'please tell me about the reasons for reforming qualifications in the HSCC and/or CBE sectors?') that were less relevant to external participants. The way the questions were written also differed as the Qualifications Wales questions were asking about stakeholder involvement and influence (for example, 'please tell me how stakeholders were involved in the sector review...?'), whilst the questions for other participants were written to focus on their experiences of being included/excluded in the process (for example, 'please tell me if/how you were involved in the sector review...?'). Schedules were designed so that relevant questions could be selected, adapted and asked during interviews based on the type of participant and their level of involvement in the reforms. Both versions of the interview schedule are included in Appendices 5 and 6.

#### 4.6.2. Pilot

Following the design of the interview schedule and before the commencement of the formal interviews, a small-scale pilot was conducted in May 2021 (see Table 12). A pilot is considered an important aspect of a research project and it is argued that piloting even on a small scale can ensure the adequacy of the instruments and prevent any unforeseen circumstances (Mason 2002; Van Teijlingen and Hundley 2002; Bryman 2016). Interview questions were piloted with two individuals from Qualifications Wales who were not involved in the HSCC or CBE reforms but had been involved in subsequent sector reviews. These individuals therefore did not form part of the main research sample but were part of the same population as those in the main study.

The pilot proved invaluable and allowed the interview schedule to be tested and any questions identified that did not function well. It also enabled an assessment of the order of the questions, the terminology used, and the timing of the interview. Feedback was collated from participants and a few changes were made to the interview schedule before the commencement of the formal interviews. Some of the questions were changed to delve beneath the surface of participants' views and perspectives by focussing on 'why'. For example, one question was changed to ask 'were any stakeholders excluded from the development of approval criteria for new VQs? If so, which stakeholders and *why* were they excluded?'. Some questions in the schedule were also reordered with the aim of improving the flow of interviews.

### 4.6.3. Conducting the interviews

One week prior to each interview, a consent form, information sheet and a shortened version of the relevant interview schedule were sent to participants (Appendices 3 and 4). When conducting online interviews, as when conducting in-person interviews, it was necessary to build a rapport with participants (Bryman 2016). The first stage of the interviews involved introducing myself, thanking them for agreeing to participate and asking some informal questions such as 'how are you?' in order to try and settle participants into the interview. The second stage explained the purpose of the research, the line of questioning and reminded participants that they could ask for clarification on any question, could decline to answer or withdraw from the research. I also requested consent to record the interview.

The third stage asked the questions in the interview schedule, using the prompts to seek clarification on specific points. The use of open questions at the start of interviews was a useful way of relaxing participants and contextualising the responses of later questions (Mason 2002). A key aspect of this stage was to allow participants to talk openly about their views and experiences of the VQ reforms under discussion whilst using probing questions to delve deeper into specific topics and to better understand

their views, perceptions and experiences. For example, I often asked 'why did you do that?' or 'why do you think that happened?' after participants responded. This was important, given my epistemologically interpretivist position, as it allowed me to get into the detail of participants' unique views and attach meaning to those viewpoints (Creswell and Poth 2018).

The final stage involved closing the interview with three questions to all participants. The first asked whether there was 'anything else they would like to tell me about the involvement and influence of stakeholders in the reforms'; then whether they had any questions about my research; and finally, whether there were any organisations and/or individuals they would recommend I speak with during the research. I finished by thanking participants for taking part in the research, explaining the process for withdrawing their data from the research and outlining the next stages of the study.

The majority of interviews took between 40-60 minutes but some were longer if the individual had been extensively involved in the reforms. For example, the interviews with some participants from Qualifications Wales were longer in duration than others due to their extensive involvement in both reforms. All interviews were digitally recorded using Microsoft Teams, following consent from participants, which was vital to aid the transcription process. I also took notes during interviews to check that all the questions had been asked and to mitigate against the recording malfunctioning.

## 4.7. Data analysis

Thorne (2000) argues that data analysis is the most complex phase of qualitative research but it is necessary to explain the process that the researcher has followed to analyse the data (Malterud 2001), communicate the findings to others (Sandelowski 1995), and produce trustworthy and insightful findings (Braun and Clarke 2006; Nowell et al. 2017). Interview data can be analysed in a range of ways such as content analysis, thematic analysis, narrative analysis and discourse analysis, grounded theory and

phenomenological analysis and each offers benefits and limitations and are more or less suited to particularly approaches.

The data for this study was subject to thematic analysis given its claimed flexibility and simplicity (Braun and Clarke 2006; 2019). Thematic analysis is a method for identifying, analysing, organising, describing, and reporting themes found within a data set and allows for the analysis of research data in greater detail than other approaches such as narrative or discourse analysis (Braun and Clarke 2006). It is a flexible approach that is widely used in the social sciences because it provides a systematic way to capture patterns in participants' views and perspectives, it can be applied across a variety of research paradigms and is suitable for identifying themes that span across the dataset. Thematic analysis goes beyond the surface layer of data by integrating the content, therefore providing a richer, more complex account of the data (DeSantis and Noel Ugarriza 2000). Thematic analysis is therefore suited for this study as it allows for analysing the nuance of participants' views, perceptions and experiences (King 2004).

Although there are reported disadvantages to thematic analysis – the main one being that it can lead to inconsistencies and a lack of cohesion in the data analysis process (Holloway and Todres 2003) – there were several advantages to the approach which made it appropriate for this study. Due to the number of interviews conducted, the flexibility and simplicity offered by thematic analysis was an important consideration given that I needed to analyse transcripts from 45 interviews within a limited period of time. The flexibility of the approach meant that data could be separated into manageable sections and re-assembled to allow comparisons and evaluation to be conducted (Ezzy 2002). This allowed codes from a range of transcripts to be presented in a coherent and meaningful way, and verbatim quotes to be presented anonymously. Such an approach meant that I could summarise key findings within a large data set and could adopt a structured approach to the analysis of data which was necessary to produce a clear and accessible thesis (King 2004).

It is claimed that thematic analysis is suitable for identifying similarities and differences in the data and generating unanticipated insights (King 2004; Braun and Clarke 2006). This was important for this study given its focus on identifying different views, perspectives and experiences relevant to VQ reforms in two employment sectors. Given my ontological and epistemological position, this approach was suitable as it allowed the exploration of the social process relating to participants' previous experiences, their beliefs, views and perspectives and how these influence particular phenomena. Although there are pitfalls to thematic analysis, particularly if applied in an inconsistent and incoherent way (see Javadi and Zarea 2016 and Finlay 2021 for a discussion on some of the potential drawbacks of thematic analysis), I worked to mitigate this risk by following Braun and Clarke's (2006) six stages of thematic analysis.

The first phase of thematic analysis was becoming familiar with the data during transcription and the subsequent review of the transcripts which I conducted between September 2021 and April 2022. I undertook a disciplined transcription schedule throughout, a task that took considerable time but was key to fully immerse myself in the data. To facilitate the transcription process, I took notes of the introductory questions at the beginning of each interview, unless there was helpful information that benefited from being transcribed. The remainder of the interviews were transcribed verbatim apart from where sections were not directly relevant to this study. I then read all transcripts and underlined initial themes and recorded handwritten notes in the margins of the transcripts.

The next two phases took place in April and May 2022. To make the analysis process more manageable, transcripts were separated into groups. Firstly, three groups were created – HSCC, CBE, and both – which were then separated based on stakeholder types as shown in Tables 4-11. I started by reading, analysing and coding the transcripts from participants from Qualifications Wales and the awarding bodies as these could provide a perspective of those who had significant involvement in the reforms, before moving on to read, analyse and code the other transcripts. Transcripts

were further annotated in the left-hand margin and further refined on the right-hand margin of the transcript. These annotations become the list of codes that were separated and recorded using Microsoft OneNote. At this stage, codes were quite 'loose'. For example, 'lack of time', 'conflict between stakeholders' and 'roles and responsibilities' were a few examples of some of the early codes. The manageability of this process was aided by the way that I had separated questions into themes within the interview schedule (see Section 4.6.1). By separating the interview questions into themes based on the overall research questions, I could more easily separate the data relevant to each research question.

Separate sections were created in Microsoft OneNote to capture and separate codes relevant to the HSCC and CBE reforms. I selected the use of Microsoft OneNote due to its flexibility and simplicity. I am familiar with the software having used it several times before as part of research projects at Qualifications Wales. I trialled the use of Nvivo during the planning stages of the study but, on balance, it did not offer many benefits relevant to this study that made it more suitable than using Microsoft OneNote. For example, the search function within OneNote offered all the features that I needed to search for key terms.

The next phase was collating codes into potential themes. Braun and Clarke (2006) argue that there are no hard and fast rules about what makes a theme as it is characterised by its significance and relevance to the research questions. Initially, I grouped similar codes (for example, 'lack of time', 'demand on time', 'insufficient resources') and assigned them a theme name (for example, 'barriers/challenges to SME involvement') that represented the group of codes. I then began to connect similar themes with patterns between them. They were allocated a main theme name which represented the themes within a group/cluster. By the end of this phase, codes had been organised into broader themes that were relevant to the research questions. Themes were then reviewed to ensure that they were accurate, coherent and whether they overlapped with others (Phase 4). Phase 5 of the analysis process, before I began

to write up the empirical chapters, was to define the themes and to "identify the 'essence' of what each theme is about" (Braun and Clarke 2006, p.92). This was an important stage to really probe what the theme was saying, if there were any subthemes, how they interacted and related to the main theme and how they related to each other.

## 4.8. Ethical considerations and data security

All research regardless of whether it is conducted by an insider or outsider, online or in-person, must conform to ethical requirements. Before collecting any data for this study, I gave careful consideration to ethical procedures to ensure that British Educational Research Association's ethical guidelines and Cardiff University's guidelines for research integrity and governance code of practice were followed (BERA 2018; Cardiff University 2019). Ethical approval was confirmed by Cardiff University's School of Social Sciences Research Ethics Committee in May 2021 (Appendix 1).

In terms of consent, participants identified for inclusion in the research were contacted and I made it clear that participation was voluntary. This was important as I worked at Qualifications Wales and they may have felt obliged to participate. I therefore emphasised that this research was separate from my role at Qualifications Wales, it was being undertaken for a doctorate programme and that they could decline to participate. This was reinforced in an information sheet (Appendix 3) that I shared with potential participants in the invitation email (Appendix 2). I informed participants of their right to withdraw from the research in line with the principle of voluntary informed consent (BERA 2018). I also informed them of my intention to record the interviews and that they could decline for the interview to be recorded if they wished. I sent a consent form to all participants one week prior to their interview which I asked them to read and, if they were willing to participate, to sign and return the consent form (Appendix 4). There was a risk that some participants, particularly those who I work with at Qualifications Wales, may have felt pressurised to participate in the research. Although the participants from Qualifications Wales were not under my direct line management, there was a risk that I may have been perceived as coercing them to participate due to the power dynamics that can exist between co-workers, particularly those who are less senior. To mitigate this risk, prior to formally inviting colleagues to participate, I met with each of them individually to explain the purpose of the research and why I had identified them for inclusion in the sample. I explained that there was no pressure on them to participate and I asked them to consider the information that I had shared and to contact me within one week to confirm whether or not they would be willing to participate. If they agreed to participate, I also reiterated to them that their participation was voluntary and they could withdraw from the study at any point.

In terms of anonymity, I did not share with any participants who else was interviewed for the study which was important as some participants know each other and work for the same organisations. Following each interview, participants were assigned aliases. All data was anonymised and recordings of interviews were stored securely complying with the requirements for data protection and General Data Protection Regulations (GDPR). Pseudonyms and non-identifiable codes were used for naming digital files that were stored on a secure Sharepoint site which I was the only person with access. I took steps to ensure that the participants were not identifiable. For example, I changed the job titles of some individuals to more generic titles (such as Manager or Senior Manager) to protect their anonymity. The information sheet and consent form outlined how participants' anonymity would be protected and how data would be collected, stored and retained (Appendices 3 and 4).

## 4.9. Critical reflections: Insider research and the 'familiarity problem'

An important aspect of the methodology is to clarify the positionality of the researcher in relation to the research (Bryman 2016). I am a senior manager at Qualifications Wales which meant that I was an 'insider' within the community I was researching. Although this offered a number of benefits such as access to information relevant to the research and better access to participants, it has implications for the knowledge generated and framing of the study and could be considered a limitation. Nevertheless, as I explain in this section, I am confident that the strategies I adopted mitigated the risks of being an insider.

An insider researcher is described as someone who undertakes research within an organisation, group, or community where they are also a member (Brannick and Coghlan 2007; Mercer 2007). This is contrasted with a research outsider who "does not have any intimate knowledge of the group being researched, prior to entry into the group" (Griffith 1998, p.361). Delamont and Atkinson (1995) claim that rarely in educational studies are researchers complete strangers to the field of study. Further, it is worth remembering that being an insider or outsider are not binary positions. Rather, they are part of a continuum with the position of the researcher dependent on their closeness to the subject being researched (Mercer 2007). Although I work at Qualifications Wales, I did not work on the HSCC or CBE reforms nor did I work closely with the external participants interviewed for this research but the participants from Qualifications Wales were my colleagues, some of which I worked closely with. Therefore, I was situated on the insider spectrum.

There were both advantages and disadvantages to being an insider that I experienced during this study. As an insider I had access to information about the reforms that outsiders would not have had, allowing me to design research questions focussed on specific aspects of the reforms that may have been unknown to outsiders. I could access information about which stakeholders could share views, perspectives and experiences to address the research questions so that I could easily identify a suitable

sample. I also had easy access to participants, an advantage that is widely recognised in the literature (Bonner and Tolhurst 2002; Fleming 2018). However, there were challenges to being an insider. Critics argue that conducting research as an insider can lead to a loss of objectivity and, therefore, a threat to the validity and reliability of the research (Van Heugten 2004; Greene 2014). Although this was a risk, as I had not been part of any elements of the HSCC or CBE reforms, the risk was significantly reduced.

While I believe that my study benefitted from my familiarity with the VQ reforms under investigation, a major challenge I faced during this study was how to 'make the familiar strange'. As an insider it could have been very easy to make assumptions based on my prior knowledge of, and familiarity with, the reforms. The familiarity problem is not unique to this study and there were important lessons that could be learnt from past research about 'fighting familiarity'. Delamont and Atkinson (1995), for example, suggest several strategies including reviewing studies in a similar field and how they did, or did not, address the familiarity problem, studying unusual or different educational settings, studying other cultures and studying completely different fields. Further, as advised by Delamont et al. (2010), I reviewed a range of literature exploring 'insider research' and the 'familiarity problem' (for example, Delamont 1981; 2005; 2012; Coffey 1999; Hammersley and Atkinson 2007; Mannay 2010; Mannay and Creaghan 2016). Through reviewing the extant research, I was able to consider what 'fighting familiarity' (Delamont and Atkinson 1995) meant for me in the context of this research and I was able to reflect on this throughout the study.

Bourdieu and Wacquant (1992) outline the need for researchers to reflect and question their own position and perceptions in relation to their research. I used a range of strategies to mitigate my own researcher bias when conducting this research. Firstly, at the outset of the study, I wrote an extended methodology that acknowledged my position, the methodological and ethical strategies needed to mitigate the risks of being an 'insider', and the practical ways in which reflexivity could be practiced (Hellawell 2006). Secondly, I included a range of views and interests in the sample in

an attempt to capture a more balanced account (Robinson 2014). Thirdly, when designing the interview questions, I included some questions that might have seemed 'obvious' (for example, 'please tell me the reasons for reforming qualifications in the HSCC and CBE sectors?'). I could have answered these questions based on my 'insider' knowledge but by asking the question, whilst being aware of my own personal views, I could avoid making assumptions based on my familiarity with the reforms. Fourthly, I was selective in sharing any personal views with participants during interviews and, instead, focussed on the interview questions that had been carefully designed as explained in Section 4.6.1. Finally, I used self-reflective tools and reflexive practice to mitigate my researcher bias during the data collection and analysis. For example, I utilised the practice of reflexivity (Bourdieu 1990; Bourdieu and Waquant 1992), which involved being critical, appraising, and evaluating how my subjectivity and positionality influenced the research process (Olmos-Vega et al. 2023). This involved immersing myself in the research by listening and questioning participants and taking a robust approach to data collection and analysis as outlined in Sections 4.6 and 4.7.

## 4.10. Conclusion

To explore the extent of stakeholder involvement and influence in the reform of VQs in Wales, I employed an epistemologically interpretivist position in line with subjectivist ontological frame to understand the unique views and perspectives of individuals and the meaning attached to those viewpoints (Creswell and Poth 2018). A comparative case study approach was used to compare and contrast the views, perspectives and experiences of participants across VQ reforms in two different employment sectors. The strengths of the study are discussed throughout this chapter. For example, the high number of interviews conducted – enabled by the efficiency of online interviewing – meant that I captured a wide range of participant views, perspectives and experiences. The broad range of stakeholders included in the sample, some of which (for example, sector trade unions) have been overlooked in previous UK research focussed on VQ reforms, was a significant strength. Some limitations are noted

throughout the chapter, such as my familiarity and positionality and that learners were not included in the research design, alongside some broader limitations encountered throughout the study. Nevertheless, the rigorous approach that I took to conduct this research, as described in this chapter, meant that the strengths of the study significantly outweighed any limitations.

The next chapter is the first empirical chapter. It presents and discusses the data relating to stakeholder involvement and influence in the reform of VQs in the HSCC sector.

# Chapter 5 – Stakeholder involvement and influence in the reform of HSCC qualifications

# 5.1. Introduction

This chapter presents the research data relating to the reform of VQs in the HSCC sector in Wales and begins to address the overall research aim which is to explore the *extent of stakeholder involvement and influence in the reform of VQs in Wales*. Through the analysis it is claimed that stakeholders such as sector bodies and employers were involved in the HSCC sector review and the subsequent development of approval criteria for new HSCC qualifications. However, levels of involvement and influence were very uneven and specific interests and voices (for example, learners, learning providers and sector trade unions) were marginalised or excluded.

The chapter begins by exploring the role of sector bodies with a focus on the influence exerted by two prominent sector bodies: Social Care Wales (SCW) and Health Education and Improvement Wales (HEIW). Secondly, it discusses the involvement of employers and how they were supportive yet subordinate actors in the process. Thirdly, the marginalisation of learning providers in the development of HSCC approval criteria is analysed, and it is argued that this potentially led to shortcomings in the design of new VQs. Fourthly, despite their involvement in the sector review, the exclusion of learners in the development of HSCC approval criteria is explored and Qualifications Wales' claim that learners are at the heart of the reforms begins to be questioned. Finally, the chapter provides evidence that the role of education unions was limited to receiving high-level updates whilst sector trade unions were not involved in any aspects of the reforms, despite having an appetite to participate in the process.

# 5.2. Sector bodies and the reform of HSCC qualifications

## 5.2.1. Sector bodies and the HSCC sector review

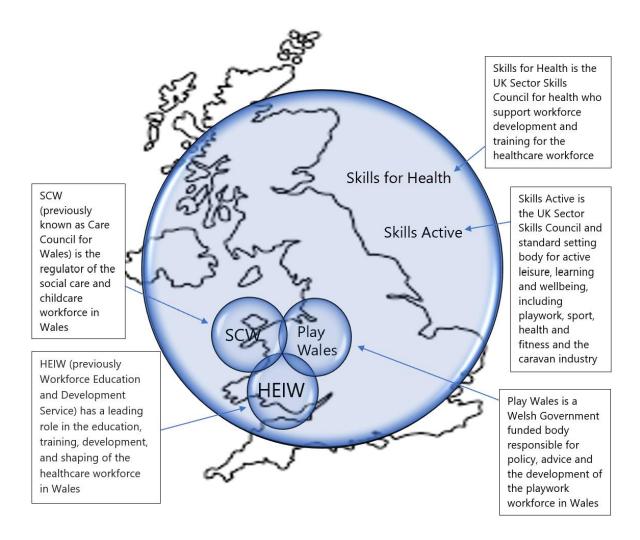
There is a complex landscape of sector bodies with an interest in VQs in the HSCC sector in Wales, as acknowledged in Qualifications Wales' HSCC sector review report (Qualifications Wales 2016b). Figure 3 shows these different sector bodies, some of which are Wales-only bodies like SCW<sup>13</sup>, which has statutory responsibilities for the social care workforce, and HEIW<sup>14</sup> that is responsible for the education and training of the healthcare workforce. Other parts of the sector are represented by UK sector bodies. For example, qualifications in playwork are covered by the remit of Skills Active, a pan-UK Sector Skills Council responsible for a wide range of National Occupational Standards<sup>15</sup> for playwork. Qualifications in playwork also fall within the remit of Play Wales, a Wales-only sector body. Healthcare qualifications are within the sectoral remit of Skills for Health, a pan-UK Sector Skills Council, but are a particular concern of HEIW. This complex make-up of sector bodies meant that, according to the HSCC sector review report, Qualifications Wales struggled to develop a clear picture of the HSCC sector in Wales or of the roles and responsibilities of different sector bodies:

There is a complex landscape in relation to organisations with an interest in qualifications in the sector. There are several different sector bodies, representing different parts of the wider Health and Social Care sector ... we found it hard to develop a clear and comprehensive picture of the system as a whole – or of the relative roles and responsibilities of the different bodies in relation to learning, employment, standards and qualifications. (Qualifications Wales 2016b, p.12)

<sup>&</sup>lt;sup>13</sup> SCW replaced Care Council for Wales in April 2017 bringing together social care workforce regulation, workforce development and service improvement in one organisation.

<sup>&</sup>lt;sup>14</sup> HEIW was established in October 2018, bringing together three key organisations for health: Workforce Education and Development Service, the Wales Deanery, and the Wales Centre for Pharmacy Professional Education.

<sup>&</sup>lt;sup>15</sup> National Occupational Standards (NOS) are statements of the standards of performance individuals must achieve when carrying out functions in the workplace, together with specifications of the underpinning knowledge and understanding. NOS are used in Wales, Northern Ireland and Scotland. In Wales, qualifications used in apprenticeship frameworks are based on NOS.



*Figure 3 - Sector bodies operating across the HSCC sector in Wales (diagram developed by the author)* 

SCW, HEIW, Skills for Health, Skills Active and Play Wales were invited by Qualifications Wales to participate in the HSCC sector review with all but Skills Active agreeing to participate. Representatives from these groups were interviewed by Qualifications Wales and were invited to be part of the Stakeholder Advisory Group (SAG) that provided advice and guidance on the draft report and reform proposals. Emily, a Manager at SCW, and Michael, a Manager at Play Wales, spoke positively about their involvement in the HSCC sector review:

I think that part [sector review] was really good. I thought that was good in actually involving us and using us as a conduit to talk to people within the sector. (Emily – Manager, SCW)

I think as far as the review process was concerned, yeah, I totally think we were listened to. (Michael – Manager, Play Wales)

However, Skills Active – the UK Sector Skills Council for playwork – chose not to participate in the sector review, despite being invited by Qualifications Wales and Play Wales. Michael from Play Wales shared his disappointment and suggested that Skills Active may have decided not to engage because they no longer had any staff based in Wales, they had limited financial resources and were unwilling to participate in any projects for which they were not funded:

It's a problem for us that our Sector Skills Council wasn't there at the table in any part of this process ... they made their last member of staff redundant in 2017 and then basically said we can only do work if we're funded to do it. (Michael – Manager, Play Wales)

Limited financial and/or human resources may have been a reason for Skills Active not participating and reflects the view of Keep (2015a) that the remaining UK Sector Skills Councils are significantly underfunded and under resourced, hindering their ability to influence VQ reforms. Indeed, even before Sector Skills Councils had their core UK Government grant removed, Keep (2015a) and others (for example, Lloyd 2008; Payne 2008) criticised Sector Skills Councils for being weak, poorly resourced, and unrepresentative of the views of employers in their sector.

The HSCC sector review culminated in proposals for the development of new HSCC qualifications. According to Angela, a Senior Manager at Qualifications Wales, the sector bodies – namely SCW, HEIW, Play Wales and Skills for Health – were consulted on the proposals through regular meetings. SCW and HEIW, however, appear to have had greater involvement and influence than other sector bodies:

The approach I took to testing the development of the review was to keep going back to SCW and the NHS people [HEIW] with, this is what we think, and this is what we're hearing ... so testing that on a one-to-one basis. (Angela – Senior Manager, Qualifications Wales)

SCW and HEIW were extensively consulted on the reform proposals and were given an opportunity to provide feedback on the full draft report prior to publication. As such, it appears that SCW and HEIW became the primary actors in the HSCC sector review. The reasons why SCW and HEIW were the primary actors in the reform process are explored in the next section.

## 5.2.2. Sector bodies and the development of HSCC approval criteria

Despite SCW and HEIW's prominent roles in the HSCC sector review, they had minor roles initially in the development of approval criteria for new HSCC qualifications because Qualifications Wales began the development work without their direct involvement. To provide the subject expertise that Qualifications Wales did not have internally, they contracted external advisers to draft the approval criteria, but SCW and HEIW were unsatisfied with the quality of the work. Emily from SCW reported that some of the draft content was unclear and did not include accurate Welsh legislation. As such, she suggested that SCW and HEIW were sidelined and were not listened to by Qualifications Wales during the early stages of the process to develop HSCC approval criteria:

Even before the awarding bodies were commissioned, Qualifications Wales made a decision to contract some expert writers ... some of the work that was submitted was of such poor quality. We kept feeding back about the quality and we weren't listened to. (Emily – Manager, SCW)

Dafydd, a Senior Manager at Qualifications Wales, indicated that they had initially misjudged the role of SCW and HEIW and that keeping them at a distance early in the development process had been a mistake:

It would be fair to say that early on we perhaps made a bit of a misjudgement on what the role of certain key stakeholders should be within the development of the qualifications... but that became problematic quite early on where, I guess, the key stakeholders [SCW and HEIW] were pushing back, saying that the quality of the

development wasn't appropriate so we had to rethink that approach. (Dafydd – Senior Manager, Qualifications Wales)

SCW and HEIW's desire to have more prominent roles in the development of HSCC approval criteria and their dissatisfaction with the early development work meant that Qualifications Wales had to change their approach to working with these two bodies. As a result, Qualifications Wales agreed that SCW and HEIW would work with the awarding bodies (City & Guilds and WJEC) to develop the content of the new qualifications and Qualifications Wales would work with the awarding bodies to agree the assessment arrangements. However, this meant that SCW and HEIW, rather than Qualifications Wales, were responsible for collaborating with stakeholders to develop the content within the approval criteria, demonstrating the influence that SCW and HEIW were beginning to exert on the process. As such, according to Angela from Qualifications Wales, after the first 12 months of the reforms, SCW and HEIW became the central actors in the process of developing HSCC approval criteria:

For HSCC, the priority for the stakeholder engagement was pledged upon the two main sector bodies so SCW, as it became, and HEIW were very heavily involved in the design and development ... they were very, very hands on in that work. (Angela – Senior Manager, Qualifications Wales)

The significant influence of SCW and HEIW became evident after the first 12 months of the approval criteria development process. They were members of the SAG convened by Qualifications Wales to oversee the governance of the reform programme that included Qualifications Wales, SCW, HEIW, City & Guilds and WJEC (but did not include learning providers, trade unions or learners). They also sat on the approval panels for the new qualifications because they provided the subject expertise that Qualifications Wales did not have and also, according to Katie from Qualifications Wales, it gave SCW and HEIW the opportunity to raise any concerns before the new qualifications were approved by Qualifications Wales to avoid repeating the challenges faced in the first 12 months of the development process as explained in the previous section:

They [SCW and HEIW] were on the approval panels ... I think HSCC worked well in making sure that the issues were ironed out before rolling out. (Katie – Senior Manager, Qualifications Wales)

The influence of SCW and HEIW largely stemmed from their influential positions as Welsh Government sponsored bodies, development partners contracted by the Welsh Government to review and develop apprenticeship frameworks and their statutory roles responsible for the registration and/or education and training of the HSCC workforce. This meant they could exert significant influence over the reform process. For example, Qualifications Wales needed the new HSCC qualifications to be accepted by SCW for inclusion on their frameworks of qualifications that individuals could undertake to register with SCW to enter the social care and childcare workforce. They also needed the new HSCC qualifications to be endorsed by HEIW as suitable qualifications for entry to employment in healthcare related roles in Wales. Therefore, the support and endorsement of SCW and HEIW was vital for the success of the reforms which meant that they held sway in the development process. As explained by Bethan, a Manager at Qualifications Wales, if the new qualifications had not aligned with SCW and HEIW's vision for the future of the HSCC sector in Wales then it would have significantly hindered the development process:

We absolutely had to have their buy in, we had to, because reputationally if we had developed qualifications that did not align to the vision that they had for the future of HSCC qualifications, we would have been shot down in flames. (Bethan – Manager, Qualifications Wales)

Pamela, a Manager from HEIW, also recognised the influence exerted by both HEIW and SCW and their central roles in the reforms:

It would have been us and Social Care Wales who had the greatest influence. (Pamela – Manager, HEIW)

The influence of government sponsored bodies, through their legal standing, statutory roles and funding from government, has been explored in the extant literature and it is claimed that they can exert significant influence on policymaking (Flinders 1999; Andre 2010). The evidence from this thesis also highlights the influence that was exerted by SCW and HEIW in the process of reforming HSCC qualifications. Of course, these bodies are arms of government (Keep (2006; 2015b; Andre 2010) and, therefore, vulnerable to redesign or abolishment by the government that created them – an issue that will be discussed directly in Chapter 7 (Section 7.3.2).

According to Dafydd from Qualifications Wales and Philip from City & Guilds, as the reforms progressed, it was SCW that developed the greatest influence. HEIW, although very influential, did not have a statutory regulatory role similar to SCW and, therefore, were not able to exert a comparable level of influence. Dafydd and Philip claimed that SCW exerted their power by threatening to not recognise the new qualifications on occasions when they were unsatisfied with the reforms:

I would say that I think SCW had the most dominant view. I think because they could constantly turn around and say 'well, we won't use these qualifications'. (Dafydd – Senior Manager, Qualifications Wales)

I definitely would say SCW had the greatest influence in the development of qualifications. I think the fact that they had the sort of sector regulatory hat that they could kind of always pull back on, and they definitely did. There were points in the process where it was like, well if you don't do it this way then we won't recognise these qualifications as a sector. (Philip – Manager, City & Guilds)

SCW's influential position was recognised by Emily from SCW who acknowledged that, due to their role as the social care workforce regulator, they held sway in the development process:

I think we had the greatest influence ... ultimately, we did have the final say because we could say 'well actually, no, we're not going to accept that qualification'. (Emily – Manager, SCW)

SCW's influence was underpinned by their role as the social care workforce regulator and their close association with qualifications used to underpin their workforce regulations. SCW had specific interests in VQs and a history of using qualifications to underpin their workforce regulations – to register with SCW to work in social care or childcare, individuals are expected to complete a qualification recognised on SCW's frameworks (SCW 2020). Moreover, SCW had an established group with an interest in VQs – their Qualifications and Standards Advisory Group – which had been in place for almost 20 years and brought together stakeholders (for example, employers, local health boards and professional bodies) to approve qualifications for acceptance on SCW's regulatory frameworks:

We've also got our Qualifications and Standards Advisory Group and they were key right from very early on, all the way through to sign off at the end. So that's a sector representative group that we've had running for a long, long time now. Perhaps it's about 2001 ... it's a really good group of people who know their stuff. (Emily – Manager, SCW)

Therefore, SCW had very specific interests in the HSCC reforms and, through their position as the workforce regulator and through their established groups/networks, could exert significant influence during the reforms.

The considerable power and influence exerted by SCW led to conflict with Qualifications Wales, particularly during the first 12-18 months of the development process, as observed by Philip from City & Guilds:

I think one of the biggest challenges for HSCC was this kind of dual regulatory roles that are held. Obviously, a qualifications regulator also a sector regulator ... I think definitely the kind of conflict I saw in that development was around there being another regulator in the process. (Philip – Manager, City & Guilds)

The conflict between Qualifications Wales and SCW stemmed from competing views and interests and a lack of clarity about the roles and responsibilities of the two organisations in relation to the HSCC reforms (see, for example, Clarke and Winch 2007; Bathmaker 2013; Wheelahan and Moodie 2018 for a related discussion on competing interests in VET systems that will be further discussed in Chapter 7). Both SCW and Qualifications Wales have statutory regulatory responsibilities that did not always align. SCW is the regulator of the social care and childcare workforce in Wales and considered the new HSCC qualifications to be a way of updating the content of qualifications to meet the needs of the workforce and to underpin their regulatory frameworks. In contrast, Qualifications Wales' interests were focussed on implementing the actions from the HSCC sector review and developing approval criteria for new qualifications that would be suitable for use in a range of settings such as secondary schools, FE colleges and WBL providers.

These interests often conflicted (conflict in similar processes are noted by others such as Raggatt and Williams 1999; Lindell 2004; Bathmaker 2013). For example, one such example that demonstrated the influence of SCW was with the work placement element of the new childcare qualifications. It was proposed by SCW that the new childcare qualifications should include a 540 hour (level 2) or 700 hour (level 3) mandatory work placement with the aim of better preparing learners to enter the workforce. But Qualifications Wales raised concerns that this could be unmanageable for learning providers, learners and employers and was disproportionate to the total number of guided learning hours within the qualifications. As such, they suggested that the total number of work placement hours should be reduced. However, in this example, it was SCW – backed by statutory regulations and their role as Welsh Government's apprenticeship development partner – that had the upper hand and the number of hours were not reduced. This imbalance in the relations of power meant that, according to Dafydd from Qualifications Wales, they often had to back down on issues during the development process:

...but when you've got such a strong influence [SCW] like within HSCC, you can probably say, we got shifted, basically, to whatever they wanted. (Dafydd – Senior Manager, Qualifications Wales)

According to Dafydd and Martyn from Qualifications Wales, the influence from SCW and HEIW appears to have come from a small number of individuals who were not at senior levels within their organisations:

We seldom saw anyone outside of one or two key players in SCW who would have, I think, been the equivalent of a qualification manager, a qualification officer post, so we are not talking about senior individuals and one or two individuals at HEIW are probably at a similar level. (Dafydd – Senior Manager, Qualifications Wales)

I think that it was recognised that maybe in HSCC that a small group of people from HEIW and SCW had quite a lot of control and power over what the qualifications looked like. (Martyn – Manager, Qualifications Wales)

Greg from SCW acknowledged that the responsibility for developing the content of the new HSCC qualifications was placed on a few individuals at SCW because they underestimated the amount of work involved and did not adequately resource the work:

We put too much on individuals and we didn't resource it well enough ... it was a huge, huge, huge product and to have one person responsible for that was folly really. (Greg – Senior Manager, SCW)

Moreover, senior staff at both SCW and HEIW, it is claimed, did not engage well in the early stages of the reforms:

...as I say, we'd have very little engagement from senior staff at SCW or HEIW. (Dafydd – Senior Manager, Qualifications Wales)

One of the primary reasons for the lack of engagement from senior staff at SCW and HEIW was that, during the period of the reforms, both SCW and HEIW underwent significant restructuring/change with new organisational structures, senior staff, people, and priorities. Pamela from HEIW acknowledged that changes at HEIW during the period of the reforms contributed to the challenges faced:

It didn't help that in the middle of it all HEIW was created. At the start of this we weren't HEIW, we were part of the NHS, we were just a team within another organisation. (Pamela – Manager, HEIW)

SCW replaced Care Council for Wales as a new Welsh Government sponsored body in April 2017, bringing together social care workforce regulation, workforce development and service improvement in one organisation. Similarly, HEIW was established in October 2018, bringing together three key organisations for health: Workforce Education and Development Service, the Wales Deanery, and the Wales Centre for Pharmacy Professional Education. The changes to these organisations arguably meant that they underestimated the amount of human resource needed to support the reforms and, therefore, they did not adequately resource the work and new senior staff at both organisations did fully engage in the reforms. This demonstrates the implications of 'newness' and how changes to Welsh Government sponsored bodies can negatively influence developments (see, for example, Higham and Yeomans 2007; Raffe and Spours 2007a; 2007b; Hodgson and Spours 2016 for a related discussion on policy memory and policy learning in relation to changes to government bodies).

It is explained in this section that the main actors involved in the reform of HSCC qualifications are situated differently in relation to regulatory frameworks, and this significantly shaped the power dynamic, and the decisions reached. We see the influence that can be exerted at a sectoral level by Welsh Government sponsored bodies. At a micro-level, we see the influence that individuals held, and their ability – backed by regulation – to direct developments. These actors, as representatives of their organisations, were central to the reforms. We also see the conflict that existed between actors and who held sway in the process.

# 5.3. Employers and the reform of HSCC qualifications

## 5.3.1. Employers and the HSCC sector review

The HSCC sector review report stated that employers were interviewed by Qualifications Wales during the review but the exact number is not included (Qualifications Wales 2016b). Participants interviewed from Qualifications Wales could also not confirm the specific number. Representatives from SCW and HEIW explained that they supported Qualifications Wales to encourage employers to participate in the sector review by sharing relevant information with their established employer networks:

I always made sure that I cascaded it [information about the sector review] far and wide ... Whether they [employers] then responded, you know, but you can only do so much can't you. So, you know, they had the opportunity to engage in the sector review. (Pamela – Manager, HEIW)

However, it was the view of Angela at Qualifications Wales that more employers could have been included in the HSCC sector review, a shortcoming that they attempted to overcome in the CBE sector review that will be discussed in Chapter 6 (Section 6.4.1):

We were conscious that we, perhaps, for HSCC hadn't involved as many employers as we would have liked to. (Angela – Senior Manager, Qualifications Wales)

The primary reason given as to why fewer employers were included than planned was that employers were challenging to engage, particularly SMEs, who make up most of the HSCC sector in Wales. This challenge was compounded by the relatively limited time (6 months) taken to undertake the review compared with the time taken (approximately two years) to undertake the CBE review. The difficulties of engaging employers in VQ reforms across the UK (for example, the development of NVQs and 14-19 Diplomas) has been widely documented (for example, Ertl and Stasz 2010; Huddleston and Laczik 2018; Malik 2022). Further, as a new organisation, Qualifications Wales had yet to establish strong links with employers and employer representative

organisations such as Regional Skills Partnerships, the Federation of Small Businesses and the CBI.

Siân, a Policy Officer from an employer body, highlighted the challenges faced by employers, particularly SMEs, when engaging in national qualification reforms including a lack of time, prioritising their busy day jobs and the challenges of releasing staff on a voluntary basis:

...for many people, you know, it's a job that they do because they want to help people and they love doing it but once they've closed the door at the end of the day they don't really want to get involved in reviews and things ... it's really difficult to get providers employers to engage in anything. (Siân – Policy Officer, Employer Representative Body)

The findings from the HSCC reforms provides further evidence to highlight some of the reasons why employers struggle to participate in VQ reforms.

Angela from Qualifications Wales indicated that, although they had involved fewer employers than planned, it was not a significant concern because SCW and HEIW were very close to employers in the sector:

I think for HSCC it wasn't so much a problem, because the sector bodies themselves were very close to employers. (Angela – Senior Manager, Qualifications Wales)

However, both SCW and HEIW are Welsh Government sponsored bodies and, although they have strong links with employers, neither was established to represent the interests and voice of employers. Therefore, the extent to which they represent, and can speak on behalf of, employers is questionable, and this will be further discussed in Chapter 7 (Section 7.3.2).

## 5.3.2. Employers and the development of HSCC approval criteria

SCW and HEIW were responsible for involving employers in the development of content for new HSCC qualifications, an approach that was taken following their

dissatisfaction at the quality of the content developed by Qualifications Wales (see Section 5.2.2). However, this meant that Qualifications Wales had limited control over the engagement with employers and, according to Dafydd from Qualifications Wales, they had to accept that SCW and HEIW had done enough employer engagement without sufficient oversight of this work:

I guess we were relatively at arm's length away from employers within that sector ... Whether I'd say we were content or not [that SCW and HEIW had done enough employer engagement], I think we lived with it in the sense of they took control ... they said, we've talked to our employer networks, and because they were the workforce regulator and they put the requirements in place for the workforce I think we just had to kind of view that as an appropriate level of engagement. (Dafydd – Senior Manager, Qualifications Wales)

It could be argued that allowing SCW and HEIW to take full control over the process of engaging with employers in the development work, without sufficient oversight of the process, was a misjudgement by Qualifications Wales. It reflects their inexperience of working with other actors in the HSCC sector but it also reflects the influence exerted by SCW and HEIW, through their powerful positions as Welsh Government sponsored bodies (see Section 5.2.2).

Emily from SCW indicated that employers were extensively involved in the process of developing the HSCC approval criteria through their employer networks and through their Qualifications and Standards Advisory Group:

Employer engagement would have been through the network groups, like the early years network. We've also got our Qualifications and Standards Advisory Group and they were key from very early on, all the way to sign off at the end. Within that group we've got representatives from employers across early years, health and social care. (Emily – Manager, SCW)

However, Katie from a local authority, who was involved throughout the process, indicated that employer engagement in the development of HSCC approval criteria

could have been better. She did not explain in what ways it could have been better beyond the observation that more employers could have been included in the process:

I think the employer element wasn't always the strongest part of the developments. (Katie – Manager, Employer A)

There were mixed responses from the employers interviewed when they were asked about their involvement in the development of HSCC approval criteria. Janet, a Manager from Employer B, outlined that she was invited by SCW to be part of the steering group that reviewed and provided feedback on the draft content of new HSCC qualifications. She indicated that she felt listened to by SCW but explained that she would have liked more involvement in the process beyond providing feedback on content that had already been drafted by SCW:

The engagement was good, I did enjoy that, and I did feel it was meaningful engagement ... we were given a draft of what had been decided on and we commented on the draft, but very little involvement in the design of the content. (Janet – Manager, Employer B)

Further, Karen, a Manager from Employer C, explained that despite not being involved in developing the content of approval criteria for new HSCC qualifications, she supported WJEC to develop the sample assessments for the new qualifications and felt she had a role, albeit limited, in the reform process:

They [WJEC] made the connection with me and asked would I take part in it. Then I went to a few meetings with them about the Angoff testing<sup>16</sup> and the way that would do and spent a couple of sessions with other people from Children's Services and we spent a day looking at case studies and how relevant they were and what standard they were at. (Karen – Manager, Employer C)

In contrast, Tony, an Assistant Manager from Employer D explained that he was not invited to participate in developing the content of HSCC approval criteria, despite

<sup>&</sup>lt;sup>16</sup> Angoff is a method that uses a group of experts to judge how difficult each item is in an exam to determine the cut-off score for a pass/grade.

having a desire to be involved. His involvement in the reforms was limited to attending events held by awarding bodies to promote the new qualifications and, therefore, he felt he was not involved or represented in the process:

No, we weren't involved at all. You know, everything seemed to have been more or less done and dusted ... I don't think we have been involved or represented, you know, from our kind of point of view anyway. (Tony – Assistant Manager, Employer D)

The evidence indicates that employers were involved in both the HSCC sector review and the subsequent development of approval criteria for new HSCC qualifications, but their involvement was limited to providing feedback on content already drafted by SCW and/or HEIW. As such, it appears that those employers involved were supportive yet subordinate actors to SCW and HEIW. Nevertheless, employers as a group of stakeholders had greater involvement in the development of HSCC approval criteria than most other stakeholders as will be discussed in the following sections.

# 5.4. Learning providers and the reform of HSCC qualifications

## 5.4.1. Learning providers and the HSCC sector review

The HSCC sector review report explained that a range of learning providers were interviewed during the review including FE colleges, WBL providers, and secondary schools (Qualifications Wales 2016b). Garyn and Stephanie, Curriculum Managers from two FE colleges, explained that they were consulted on the reform proposals and felt they were listened to by Qualifications Wales during the review:

I think it was good to be involved. I think it was one voice, but my voice was listened to, and I think fed in. (Garyn – Curriculum Manager, FE College A)

In the beginning, yes we were listened to ... and it was exciting at that point because you thought, yes, this is going to be amazing. (Stephanie – Curriculum Manager, FE College B)

Qualifications Wales also included the representative bodies for FE and WBL – ColegauCymru and NTFW – to seek their views during the HSCC sector review. Both organisations were invited by Qualifications Wales to have a representative on Qualifications Wales' SAG that reviewed the draft sector review report. Richard, a Senior Manager at NTFW, indicated that he was involved throughout the sector review and was consulted on the reform proposals:

In terms of the HSCC review, my involvement with it went all the way back to the very early stages of the review, including, I guess, sort of, setting up the terms of reference, etcetera, for it. (Richard – Senior Manager, NTFW)

Therefore, the voice of learning providers was present throughout the HSCC sector review – either directly or through ColegauCymru and NTFW – and they were interviewed, had an opportunity to review the draft report and offer feedback on the reform proposals.

#### 5.4.2. Learning providers and the development of HSCC approval criteria

The evidence suggests that, despite learning providers being involved in the HSCC sector review, they were marginalised in the process of developing approval criteria for new HSCC qualifications. Similarly, research focussed on Curriculum 2000 reforms (Hodgson and Spours 2003; Hodgson et al. 2004) and the development of 14-19 Diplomas (Nuffield Foundation 2007) also found the views of teachers and learning providers were marginalised or excluded. Dafydd from Qualifications Wales explained that learning providers had only superficial involvement in the process of developing HSCC approval criteria:

The colleges were engaged, but I think, if we're honest, at a relatively superficial level. (Dafydd – Senior Manager, Qualifications Wales)

Dafydd explained that learning providers were updated on the progress of the reforms but were not involved in developing the content of approval criteria for new HSCC qualifications because, in his view, SCW and HEIW developed the content with the input of the employers they regulate but did not sufficiently involve learning providers. Interviewees from FE colleges supported this view and reported that they did not have a voice in the development of HSCC approval criteria. It was the view of Stephanie from FE College B that she had very little involvement in the development work:

I don't think we had any role in the design. We were told what it was going to look like. We gave feedback, which on occasions was listened to, but, overall, I think it had been decided. There was a great emphasis on engaging employers .... but it was imbalanced really ... although employers have a part to play, they do not understand always the logistics of running and rolling out a qualification. (Stephanie – Curriculum Manager, FE College B)

It could be argued that the marginalisation of learning providers led to shortcomings in the design of HSCC qualifications. For example, an issue highlighted by Stephanie from FE College B was that the new level 3 childcare qualification is the size of two A Levels whereas the qualification that it replaced was the size of three A Levels. As a result, FE colleges would need to offer an additional VQ or A Level alongside the new childcare qualification to provide a programme of sufficient size for learners to access HE. She claimed that this was raised as a concern with Qualifications Wales and SCW but, as FE colleges only had a very minor role in the development process, she felt they were not listened to:

One clear issue that we raised early on with the childcare qualification. The old childcare qualification was worth three A levels. Right. The new one is worth two [A levels] ... but it didn't make sense ... it's those type of pressures I think that we raised and raised, and we just weren't listened to. (Stephanie – Curriculum Manager, FE College B)

In 2022, following the data collection for this thesis, Qualifications Wales' rapid review of HSCC qualifications identified the shortcomings of the new level 3 childcare qualification mentioned above and proposed the development of a new level 3 qualification that was the equivalent size of three A Levels in order to address the issues encountered by FE colleges (Qualifications Wales 2022). It could be argued that this issue could have been avoided if representatives from learning providers had been better involved in the process of developing HSCC approval criteria, or if their concerns had been listened to during the development process. This argument will be further developed in Chapter 7 (Section 7.3.3), focusing on the wider issue of some stakeholder voices being marginalised or excluded in the reform process.

Interviewees from FE colleges were also critical that senior representatives at FE colleges were not sufficiently included in the reforms. ColegauCymru has a group of college principals and vice principals – the Curriculum and Quality (C&Q) Group – who are responsible for engaging with Welsh Government and education bodies such as Qualifications Wales. But, according to Garyn from FE College A, Qualifications Wales did not effectively engage with this group during the HSCC reforms:

I think a recommendation, if you like, would be now to go through more formal networks to establish that FE voice. I think it should've probably gone to a more senior group at ColegauCymru right in the early stages. (Garyn – Curriculum Manager, FE College A)

This research identified two primary reasons for the lack of engagement with the C&Q Group. Firstly, the C&Q Group was newly established and had not, according to Rhys, a C&Q Group member, established a structure that could effectively influence national qualification reforms:

I think the C&Q Group hadn't necessarily set a structure up where we were able to influence what was happening as a group of colleges. (Rhys – Senior Manager, FE College C)

This may explain why, according to participants from Qualifications Wales, several attempts were made by Qualifications Wales to engage with the C&Q Group but they showed little interest in the early stages of the reforms. Secondly, Qualifications Wales was a very new organisation who had yet to establish strong relationships with groups such as the C&Q Group.

The evidence in this section indicates that learning providers, despite being involved in the HSCC sector review had almost no involvement (or influence) in the development of HSCC approval criteria which may have negatively impacted on the technical design of new VQs. There was some suggestion that SCW and HEIW had some influence over which stakeholders were included/excluded in the process. We also see that senior staff at FE colleges were not involved despite a suggestion from interviewees that they could have been better involved through their C&Q Group.

## 5.5. Learners and the reform of HSCC qualifications

Learners were not interviewed for this study (explained in Chapter 4 Section 4.5) but data was generated on learner involvement during interviews with others. The HSCC sector is the largest employment sector in Wales in terms of the number of certificates awarded with more than 64,000 qualification certificates awarded to learners in Wales in 2023/24 (Qualifications Wales 2024). According to the HSCC sector review report, Qualifications Wales commissioned an external agency who conducted in-person focus group discussions with over 800 learners to capture their views about HSCC qualifications:

We commissioned an external agency, Cognition, to conduct a programme of learner engagement to elicit the views of learners. They listened to over 800 learners in a range of settings. (Qualifications Wales 2016b, p.9)

However, no examples of influence were identified by this study. Learners were not part of the SAG and their involvement was limited to providing feedback on the current arrangements rather than contributing to the reform solutions.

Despite Qualifications Wales claiming that learners are at the heart of their work (Qualifications Wales 2023b), there appears to have been no involvement of learners in the development of HSCC approval criteria. According to Angela from Qualifications Wales, the reason for this was that there is an absence of structured mechanisms and/or groups/networks to involve learners and, therefore, they are difficult to meaningfully engage in qualification reforms:

I think that we need to think about how we involve them [learners] in reform more and that's really tricky and I don't quite know how best to do it, but I think that's something that we need to think about. (Angela – Senior Manager, Qualifications Wales)

The challenges of involving learners – who are a disparate and transient group – in VQ reforms is well documented (Elwood and Lundy 2010; Elwood 2012; 2013). The exclusion of learners in the development of HSCC approval criteria resonates with the views of Elwood and Lundy (2010) that qualifications and examinations are key areas of education policy where learner views are rarely sought.

When discussing the exclusion of learners, Angela from Qualifications Wales claimed that, in the absence of learner involvement, there was an assumption that learning providers were representing the interests of learners:

...to some extent colleges represent learners in that they know the people that we work with and know what the learners are like that they work with. So, we thought about the learners all the time. (Angela – Senior Manager, Qualifications Wales)

However, the interests of learners and learning providers are different (see Chapter 3 Section 3.2.2). Therefore, it was highly questionable whether learning providers could represent a diverse 'learner voice' and act as a proxy for learner involvement, particularly as learning providers themselves were marginalised in the process (see Section 5.4.2).

The evidence indicates that learners were involved in the HSCC sector review, but their involvement was limited to providing feedback on current arrangements rather than contributing to, or providing feedback on, any reform solutions. Further, learners had no role in the development of approval criteria for new HSCC qualifications. The absence of networks/groups to represent learners contributed to their exclusion. The

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exclusion of learners calls into question Qualifications Wales' claim that learners are at the heart of the reforms which will be discussed in Chapter 7 (Section 7.3.4).

## 5.6. Unions and the reform of HSCC qualifications

## 5.6.1. Education unions

Education unions were not interviewed during the HSCC sector review nor were they part of Qualifications Wales' SAG. They were also not included in the development of HSCC approval criteria. However, it is claimed by Carys, Policy Officer at Education Union A, that she was updated on progress of the reforms through Qualifications Wales' Trade Union Representative Organisations (TURO) Group which brings together education unions (but not sector trade unions) and is chaired by Qualifications Wales' Chief Executive or Chair. Carys spoke positively about the way that she was kept updated on progress throughout the HSCC reforms through regular updates and meetings with Qualifications Wales:

Qualifications Wales made sure that we were part of the process and that we had an opportunity to share our opinions. (Carys – Policy Officer, Education Union  $A^{17}$ )

In contrast, James, Policy Officer at Education Union B, felt that he was not sufficiently included in the HSCC reforms because, in his view, consultations about the reforms were not well advertised by Qualifications Wales:

From what I can gather, not a great role in the HSCC reforms ... there was certainly a feeling that the consultations weren't particularly well advertised. (James – Policy Officer, Education Union B)

Despite being part of Qualifications Wales' TURO Group, it appears that James expected that education trade unions should have more involvement in the reforms beyond being updated on developments that had progressed without their involvement. He suggested that his union could have nominated union members with

<sup>&</sup>lt;sup>17</sup> This quote was translated from Welsh.

expertise in HSCC qualifications to participate in the development of HSCC approval criteria, thus providing members of his union with a voice in the process.

## 5.6.2. Sector trade unions

Sector specific healthcare trade unions and the Wales TUC were not involved in any aspect of the HSCC reforms. Dafydd from Qualifications Wales explained that sector trade unions were not included in the reforms. He explained that Qualifications Wales had not considered trade unions to be stakeholders who could contribute to the reforms and, therefore, they were not included in their work:

So, we never directly engaged them [sector trade unions] with project work ... perhaps that's something that we need to look at in more detail. (Dafydd – Senior Manager, Qualifications Wales)

Melissa, Policy Officer at Trade Union A, representing workers across the HSCC sector, reported that they were not involved in any aspects of the reforms and she shared a view that influential public bodies such as Qualifications Wales and SCW do not understand the role of sector trade unions in Wales and, therefore, exclude them from their work:

There seems to me to be a lack of understanding within the sector ... about what it is that trade unions do, and how we can support the process. We are still a collective voice for workers in the sector and that doesn't seem to be acknowledged. (Melissa – Policy Officer, Trade Union A)

She explained that if they had been involved, they could have brought together groups of interested members to contribute different perspectives to other stakeholders. For example, the content of the new HSCC qualifications primarily focusses on patient safety and, according to Colin from Trade Union A, if they had been included in the reforms, they would have put forward a case for more of a focus on the safety of workers in the content of new qualifications: There's no element in the qualifications about the requirements for health and safety for staff or other care workers ... it's an example where, had we been involved more in discussions about the VQs, I think we would have asked for that to be included, because it's an area that's neglected. (Colin – Policy Officer, Trade Union A)

The exclusion of sector trade unions in such reforms is not uncommon and aligns with the view of Keep et al. (2010) and others (for example, Stuart and Huzzard 2017; Stuart 2019; Vossiek 2019) who argue that trade unions have been almost entirely excluded from the governance of VET at a national level across the UK over the past 40 years. Despite their desire to participate, the exclusion of sector trade unions reflects the marginal role afforded to trade unions in the UK VET system (further discussed in Chapter 7 Section 7.3.1).

## 5.7. Conclusion

It is established in this chapter that, although stakeholders such as sector bodies and employers were involved in the HSCC sector review and the subsequent development of approval criteria for new HSCC qualifications, levels of involvement and influence were very uneven. SCW and HEIW – as prominent Welsh Government sponsored bodies, backed by statutory regulations, networks and mechanisms to represent their interests and possessing the necessary human and financial resources dedicated to Wales - were powerful actors and influenced most aspects of the reforms. Other stakeholders were involved in the reforms but their ability to influence varied. For example, employers were consulted on the content of HSCC approval criteria but their participation was limited to a supportive role of providing feedback on content that had been drafted by other more prominent actors such as SCW and HEIW. In contrast, specific interests and voices were marginalised or excluded. For example, learning providers, despite participating in the sector review, were sidelined in the process of developing HSCC approval criteria which arguably led to shortcomings in the design of the gualifications. Learners, without groups/networks to collectively represent their interests, were also excluded from the development of HSCC approval criteria. Further,

trade unions, despite their prominent roles in VET systems in other countries (see Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020) were excluded from all elements of the reforms.

The next chapter presents the research data relating to the reform of VQs in the CBE sector in Wales.

# Chapter 6 – Stakeholder involvement and influence in the reform of CBE qualifications

# 6.1. Introduction

This chapter presents the research data relating to the reform of VQs in the CBE sector in Wales and further addresses the overall research aim which is to explore the *extent of stakeholder involvement and influence in the reform of VQs in Wales*. The findings presented in this chapter indicate that stakeholders such as sector bodies, employers and learning providers participated in the CBE sector review and the subsequent development of approval criteria for new CBE qualifications. However, as with the HSCC reforms discussed in Chapter 5, levels of involvement and influence were very uneven and specific groups (for example, learners and trade unions) were marginalised or excluded from the process.

The chapter begins by exploring the role of sector bodies with a specific focus on the influence exerted by the Construction Industry Training Board (CITB) who was a primary actor in the sector review and the process of developing approval criteria. Secondly, the prominent role of learning providers and the reasons why they had significant involvement and influence in the development of CBE approval criteria are discussed. Thirdly, the involvement of employers and the challenges of engaging SMEs in the process of developing approval criteria are explored. Fourthly, despite their involvement in the CBE sector review, the exclusion of learners from the development of CBE approval criteria is analysed. Finally, the involvement of education trade unions and the exclusion of sector trade unions are discussed.

## 6.2. Sector bodies and the reform of CBE qualifications

## 6.2.1. Sector bodies and the CBE sector review

The CBE sector in Wales is extremely large and diverse, covering a highly disparate range of industries and trades, from private house building and maintenance to major civil engineering works with over 95% of employers in the sector being SMEs and micro-businesses (Welsh Government 2023c). Within this diverse sector, numerous sector bodies have an interest in VQs compared with the HSCC sector which has two very influential sector bodies as explained in Chapter 5 (Section 5.2). Qualifications Wales' CBE sector review report outlined a number of sector bodies that participated in the review (Qualifications Wales 2018a). As shown in Table 13, the CITB, the Chartered Institute of Building, the Electrical Contractors' Association, the Civil Engineering Contractors' Association, and the Building Engineering Services Association were all invited by Qualifications Wales to be interviewed during the sector review. They were also invited by Qualifications Wales to be part of their SAG that advised and guided them on sector related matters throughout the review.

Sector body	Description
СІТВ	Industry training board for the construction sector in
	England, Scotland, and Wales. Established in 1964, they
	work with industry and the UK Government (and
	devolved governments) to equip the construction sector
	with the skills and talent needed to succeed. They are an
	executive non-departmental public body, sponsored by
	the UK Government's Department for Education, and are
	accountable to government ministers, and ultimately the
	UK Parliament. They have a team specifically for Wales
	and, at the time of the CBE reforms, were the
	development partner contracted by the Welsh
	Government to develop, review and update
	apprenticeship frameworks for the construction sector.
	They were also responsible for reviewing and updating
	National Occupational Standards for construction.

Electrical Contractors'	A UK trade association for the electrotechnical and
Association	engineering services industry. Formed in 1901, it
	represents almost 3000 members employers across the
	UK.
Civil Engineering Contractors	A representative body for more than 300 employers
Association	across civil engineering industry in England, Wales and
	Scotland. This includes employers that deliver, upgrade,
	and maintain the country's infrastructure in key
	industries such as transport, energy, communications,
	waste and water.
Building Engineering Services	UK employer membership organisation, established
Association	over 120 years ago, representing employers across the
	building engineering services sector.
Construction Skills Certification	A certification body that provides industry recognised
Scheme	CSCS cards as proof that individuals working on
	construction sites have the appropriate training and
	qualifications to work safely in UK construction.

Table 13 - Sector bodies involved in CBE sector review

Although these sector bodies were interviewed by Qualifications Wales during the sector review and were part of the SAG, the CITB had a more prominent role than other sector bodies – a role that was established early in the review. Angela, a Senior Manager at Qualifications Wales, explained that at the outset of the review, Welsh Government officials suggested that they should involve the CITB due to their unique role as the development partner contracted by the Welsh Government to develop, review and update apprenticeship frameworks for construction in Wales. She explained that this coincided with a senior representative from the CITB directly requesting that Qualifications Wales focus on the CBE sector early in their programme of sector reviews:

That also coincided with a direct approach from the CITB to our chief executive saying that they would like to be reviewed next. (Angela – Senior Manager, Qualifications Wales)

This demonstrates the CITB's early interest in the work of Qualifications Wales, the access that the CITB had to senior staff at Qualifications Wales and the proactive

influence they had over which sectors were reviewed. Mathew, a Senior Manager at the CITB, claims that he proactively pursued being involved in the sector review and was extensively involved throughout. This included being interviewed by Qualifications Wales, responding to the consultation, encouraging employers to participate in the review and supporting Qualifications Wales to organise and facilitate stakeholder events:

We were heavily involved ... we were very much the organisation on the ground that got a lot of individuals to give first hand direct feedback. (Mathew – Senior Manager, CITB)

The prominent involvement of the CITB meant that they had access to influence the work of Qualifications Wales. Representatives from the CITB met regularly with the sector review team at Qualifications Wales and were heavily involved in developing the reform proposals. For example, Mathew from the CITB and Angela from Qualifications Wales explained that senior staff at the CITB and Qualifications Wales met regularly, both in a formal and an informal capacity, giving the CITB the platform to influence the sector review recommendations made by Qualifications Wales:

I was in discussion with Angela a lot, let's say, so some of it was formal, some of it was informal. We had a really good working relationship. (Mathew – Senior Manager, CITB)

So, in terms then of forming our recommendations ... we did meet regularly with CITB including quite a few senior people. (Angela – Senior Manager, Qualifications Wales)

As a result of the close engagement between Qualifications Wales and the CITB, it was the view of Bethan, a Manager at Qualifications Wales, that the CITB became the most prominent actor in the process:

I would say CITB were our major stakeholder there because they are absolutely the most important body in the whole of the industry in Wales, and in the UK. (Bethan – Manager, Qualifications Wales) Three primary reasons can be identified as to why the CITB had such an active and influential role in the sector review. Firstly, as a long-established sector body for the construction industry, they have a prominent position in the sector and have links with employers across Wales. They have a strong footprint in Wales as the body contracted by the Welsh Government to develop, review and update apprenticeship frameworks for construction. They are also responsible for reviewing and updating the National Occupational Standards for construction in Wales that underpin the content within VQs. Chris, a Manager at Qualifications Wales, explained that the CITB are one of only a few bodies (across all sectors) that, at the time of the CBE reforms, were contracted by the Welsh Government to be their apprenticeship development partner without the contract going to an open tender process, demonstrating their unique position in the CBE sector in Wales:

There's about 20 of them that are sort of on the books that they [Welsh Government] can call upon to review or develop new apprenticeship frameworks, and CITB are the only ones in Wales with a construction focus. (Chris – Manager, Qualifications Wales)

Secondly, as a public body funded primarily through the statutory CITB Levy<sup>18</sup> (CITB 2023) – which other sector bodies in the sector did not receive – the CITB had the necessary human and financial resources, dedicated to Wales, to be able to extensively participate in, and influence, the review. This compares with SCW and HEIW in the HSCC reforms who, like the CITB, were also supported by funding to support their work that other sector bodies did not have (the importance of financial resources as an enabler to stakeholder influence are noted by others, for example, De Bakker et al. 2002; Lindell 2004; Ramli et al. 2024). According to Angela from Qualifications Wales, the CITB had a team based in Wales that were responsible for education and

<sup>&</sup>lt;sup>18</sup> The CITB Levy, governed by the CITB, is a statutory levy that applies to employers engaged wholly or mainly in construction industry activities. It is calculated based on the total amount paid to employees and Construction Industry Scheme subcontractors within the construction industry. The CITB Levy funds are used to provide CITB training and to promote a skilled workforce, ensuring that the construction industry is equipped to meet both current and future demands.

qualifications who had the capacity to dedicate significant time to support the sector review:

CITB have a particular set of people dedicated to qualifications in Wales ... they basically could get to devote to work on this full time pretty much. (Angela – Senior Manager, Qualifications Wales)

Thirdly, Mathew from the CITB explained that, to support Qualifications Wales, they seconded a member of staff to Qualifications Wales to act as a sector adviser for the review:

We seconded [CITB representative], our Qualifications and Standards Manager, across to Qualifications Wales ... I think by having [CITB representative] involved it seemed to work quite well. (Mathew – Senior Manager, CITB)

The individual seconded from the CITB to Qualifications Wales conducted interviews with employers during the review, drafted sections of the review report and was involved in formulating the reform proposals that accompanied the report. This gave the CITB access to influence the decisions made by Qualifications Wales, putting them in a powerful position to shape outcomes not afforded to other sector bodies.

Other sector bodies such as the Electrical Contractors' Association, the Building Engineering Services Association and the Construction Skills Certification Scheme were interviewed by Qualifications Wales during the review and were consulted on the reform proposals through formal discussions but they did not have the same access to influence representatives at Qualifications Wales as the CITB. Nevertheless, two managers explained that they were satisfied with their role in the sector review:

Yes, definitely, CSCS had a voice and influence within the changes made. (Michelle – Manager, Construction Skills Certification Scheme).

We were involved from the very early stages, and we've been kept informed and brought along the whole journey, so I can't say anything other than positive in that regard. (Catherine – Manager, Electrical Contractors' Association) The evidence in this section indicates that sector bodies participated in the sector review process but it was the CITB – underpinned by their role as the sector body for the construction industry in Wales, Welsh Government's apprenticeship development partner for construction and supported by the necessary human and financial resources – who were the central actor.

## 6.2.2. Sector bodies and the development of CBE approval criteria

Following the publication of the CBE sector review report (Qualifications Wales 2018a), Qualifications Wales set out to collaborate with a range of sector bodies such as the CITB, Electrical Contractors' Association and the Construction Skills Certification Scheme in the development of approval criteria for new CBE qualifications. Catherine, a Manager at the Electrical Contractors' Association, explained that their role was to act as a conduit between Qualifications Wales and employers when developing the electrical related approval criteria:

Our role was to bring in the employers and for them to understand that the qualification wasn't going to be watered down because we do consider the apprenticeship for an electrician in our sector to be the gold standard qualification ... I think we've done more [employer engagement] than we've ever done in the past. (Catherine – Manager, Electrical Contractors' Association)

Similarly, Michelle from the Construction Skills Certifications Scheme, outlined that she was involved during the process of developing approval criteria for new CBE qualifications but her role was to ensure that the new qualifications would allow learners to access a Construction Skills Certification Scheme card so that they could gain employment in industry:

We were heavily involved in ensuring that at the end of these achievements that they [learners] can move onto a skilled trade. And the involvement that we had gave us better knowledge to then be able to put it straight into the card scheme ... we were involved in a lot of the meetings around the workshops with the employers because you see with most things to do with construction, at the end result they want a CSCS card. (Michelle – Manager, Construction Skills Certification Scheme)

Despite the involvement of different sector bodies, as we saw in the sector review phase of the reforms discussed in the previous section, the CITB remained the most prominent actor in the process. They were invited by Qualifications Wales to work closely with them to develop approval criteria for new CBE qualifications. They sat on Qualifications Wales' awarding panel during the process to contract the awarding bodies (City & Guilds and EAL) to develop the new CBE qualifications, giving them a prominent platform early in the development process. They also worked closely with representatives from Qualifications Wales to establish and manage the SAG meetings. As such, it was the view of Chris from Qualifications Wales that the CITB became the central actor in the approval criteria development process:

I think CITB have probably been, I mean they are, I think it's fair to say, the most significant stakeholder. (Chris – Manager, Qualifications Wales)

A notable example of the CITB's influence was with the design of the approval criteria for new apprenticeship qualifications. Qualifications Wales initially proposed the development of a new Foundation qualification – a level 2 qualification that would include a new dual trade requirement – that would be a part of all CBE apprenticeships. This approach meant that an apprentice would need to study and be assessed on two trades/subjects such as electrical and tiling or plumbing and carpentry within the new Foundation qualification to avoid them having to specialise at an early age. However, the CITB raised concerns that it would be unmanageable for employers because it would require apprentices to be supported by two employers offering two different trades. The CITB therefore urged Qualifications Wales to change their approach. As the apprenticeship development partner commissioned by the Welsh Government, the CITB could decide which qualifications to accept for apprenticeships in Wales giving them significant leverage to influence Qualifications Wales. Following pressure from

the CITB, as indicated by Mathew from the CITB, Qualifications Wales agreed to change their approach and develop a new Core qualification that would only include a traditional single trade requirement:

There has been a big hoo-ha about whether the Core or whether the Foundation ... slowly we've got them [Qualifications Wales] to see what's a sensible outcome, and a sensible size qualification and something that will be accepted by the sector moving forward. I think we are now just about there, but it has been a real challenge. (Mathew – Senior Manager, CITB)

This was a significant shift from Qualifications Wales' original intentions and, according to Chris and Angela from Qualifications Wales, demonstrated the significant influence exerted by the CITB during the development of CBE approval criteria:

The biggest bit of influence I think they've [CITB] had is over the creation and development of the Core in CBE qualification. (Chris – Manager, Qualifications Wales)

CITB did have the influence with the Core qualification. (Angela – Senior Manager, Qualifications Wales)

A further example of the influence exerted by the CITB was with the Essential Skills<sup>19</sup> requirements within the new apprenticeship frameworks. At the beginning of the reforms, according to Angela and Chris from Qualifications Wales, they advised the Welsh Government that the Essential Skills requirements for new apprenticeship frameworks to accompany the new qualifications should be set at level 1 to avoid Essential Skills being a barrier to learners accessing apprenticeships or successfully completing their apprenticeship framework. However, when the CITB was contracted by the Welsh Government to develop the new apprenticeship frameworks, they set the Essential Skills requirements at level 2 as an indication of their desire to raise standards

<sup>&</sup>lt;sup>19</sup> All apprenticeship frameworks in Wales include the requirement for Essential Skills Wales qualifications (Application of Number, Communications and/or Digital Literacy). The level of Essential Skills Wales qualifications differs depending on the level of the apprenticeship framework as set out in Welsh Government's Specification for Apprenticeship Standards in Wales.

in the construction industry. Mathew from the CITB explained that, in their role as the apprenticeship development partner, they had to challenge the Welsh Government and to do what he considered was the right thing for raising standards in the sector:

We are working through with the apprenticeship team [at the Welsh Government] how the qualifications now go into the apprenticeship frameworks. We had to really go back hard and challenge the Welsh Government [on the Essential Skills requirements]. So, you know, we are not afraid to do the right thing and it doesn't always make us popular but ultimately when we end up with what is hopefully going to be a really whizz-bang solution for the sector and everyone's happy, then we'll be able to sit back and say it was worth the hard work and effort. (Mathew – Senior Manager, CITB)

The outcome of this decision meant that learners, who would have traditionally completed level 1 Essential Skills qualifications would now need to complete level 2 Essential Skills qualifications as part of the new apprenticeship frameworks. This demonstrated the competing views and interests of Qualifications Wales and the CITB (see Clarke and Winch 2007; Bathmaker 2013; Wheelahan and Moodie 2018 for a related discussion on the challenges of balancing competing interests in VET systems). It also, according to Chris and Angela from Qualifications Wales, demonstrated the influence that the CITB exerted in the development process:

Essential skills is a big thing because that's where CITB did an about turn, which was very annoying. (Angela – Senior Manager, Qualifications Wales)

The primary reason why the CITB could exert influence in these two specific examples was due to their position as Welsh Government's apprenticeship development partner. This meant that they could decide which qualifications and at which levels could feature on publicly funded apprenticeship programmes in Wales. Therefore, as with SCW and HEIW in the HSCC reforms, although Qualifications Wales had the power to commission, develop and regulate new CBE qualifications, the CITB could veto the developments by deciding not to accept the qualifications for use on apprenticeship frameworks. According to Chris from Qualifications Wales, this gave the CITB the upper

hand during the development of approval criteria for new apprenticeship qualifications:

Having that status as the framework developer allowed them to shape the agenda ... and meant that they could make recommendations to the Welsh Government. (Chris – Manager, Qualifications Wales)

The evidence in this section indicates that the CITB was an influential actor in the approval criteria development process, but other sector bodies also had a role, albeit with less involvement and influence than the CITB. Their influence was underpinned by their prominent position as the sector body for the construction industry in Wales and their role as the Welsh Government's apprenticeship development partner. As a public body funded by the CITB Levy, they also had the resources to influence developments.

## 6.3. Learning providers and the reform of CBE qualifications

## 6.3.1. Learning providers and the CBE sector review

A range of learning providers were involved in the CBE sector review. Qualifications Wales interviewed representatives from all FE colleges and Welsh Government contracted WBL providers who offered CBE related qualifications and a sample of secondary schools. Participants from learning providers interviewed for this research reported that they were consulted on the reform proposals prior to the publication of the CBE sector review report through meetings and group discussions with Qualifications Wales and a formal consultation. Rhys and Gavin, from FE Colleges C and D, explained that they had ample opportunity to share their views about the CBE reform proposals:

We did fully respond to the consultation that Qualifications Wales undertook, which I think was good for us because it made us aware of the thought process that you were going through. (Rhys – Senior Manager, FE College C) I think they [Qualifications Wales] engaged very well during the sector review if I'm honest ... I do know that we were consulted and involved on a number of occasions prior to publication. (Gavin – Curriculum Manager, FE College D)

The primary way that Qualifications Wales engaged with representatives from FE colleges was through the British Association of Construction Heads (BACH) Wales Network<sup>20</sup> of learning providers. The BACH Network has been in place for over 30 years and brings together the heads of construction departments at FE colleges and some WBL providers across Wales. Angela from Qualifications Wales explained that they extensively engaged with the BACH Network throughout the review:

We had ongoing engagement with them [BACH] both before the review was published and afterwards in between the review being published and the awarding body being commissioned, and we focused on different aspects of the qualifications in several meetings. (Angela – Senior Manager, Qualifications Wales)

Although the BACH Network had an opportunity to share their views on the reform proposals, not all members of the Network were supportive of Qualifications Wales' reform proposals, demonstrating the competing views and interests of those from different learning providers. The most contentious proposal, which led to a split between BACH Network members, was whether to support the move from a single to dual trade for the new level 2 Foundation qualification. Some FE colleges did not agree with this proposal as it moved from a long-established approach and would mean that teachers would need to teach and assess more than one subject which could cause manageability and resource issues for providers. Gavin from FE College D explained the conflict that existed in the BACH Network relating to the dual trade proposal:

There was conflict within our group as to whether we should've really pushed for a different model of multiskilling ... but that was all dealt with really through lots of discussion, to be honest, and coming to a consensus view, where some people are going to be disappointed but

<sup>&</sup>lt;sup>20</sup> Referred to as the BACH Network throughout this thesis.

so we went with the majority view. (Gavin - Curriculum Manager, FE College D)

It was suggested by Angela and Chris from Qualifications Wales that a resistance to change may have been one of the reasons why representatives from some FE colleges were reluctant to support the dual trade proposal, suggesting that the willingness to change varied between different individuals and institutions:

I think the objection primarily was based on just a resistance to change. In the sense that I don't think they really perceived there was too much of a problem with what they were currently doing. (Chris – Manager, Qualifications Wales)

There's a resistance to change. It's something different. It's something very different because actually what they've been running for decades is a single trade approach. (Angela – Senior Manager, Qualifications Wales)

However, despite these views, it appears that the perspectives of some FE colleges were rooted in genuine concerns around the manageability of teaching and assessing more than one subject, which most colleges and teachers were familiar with:

There was a lot of discussion and debate about the whole multi-skilling part of it, which is the big change obviously cause most trainees and teachers do singled-skill route at the moment. (Gavin - Curriculum Manager, FE College D)

Nevertheless, a majority of BACH Network members agreed to support the reform proposals but there were members of the Network that continued to resist the reform proposals which proved challenging during the development of CBE approval criteria as will be discussed in the next section.

## 6.3.2. Learning providers and the development of CBE approval criteria

Chapter 5 (Section 5.4.2) outlined that learning providers were marginalised in the process of developing HSCC approval criteria. In contrast, the involvement of learning providers in the development of CBE approval criteria was markedly different with FE

colleges (primarily through the BACH Network), in particular, having a prominent role. This suggests some differences with the findings of studies of previous reforms that identified the marginalisation and exclusion of teachers and learning providers (see Hodgson and Spours 2003; Hodgson et al. 2004; Nuffield Foundation 2007). Angela and Dafydd from Qualifications Wales explained that they learnt lessons from the HSCC reforms, and they made significant efforts to involve learning providers in the development of CBE approval criteria:

We were very careful also to involve very closely from the outset the colleges and learning providers who delivered construction qualifications. We've made real strides in construction because we engaged so regularly with the BACH group of construction heads. (Angela – Senior Manager, Qualifications Wales)

I think within construction it was quite a different approach to the engagement with the colleges. We had identified that you need to engage with the colleges ... the BACH Network in particular and they have a Wales network. So, they have engaged with us, I guess, a lot more in the development of the qualifications, particularly around the broader content that has been built into the new CBE qualifications. (Dafydd – Senior Manager, Qualifications Wales)

This study identified two primary reasons why representatives from learning providers had a more prominent role in the development of CBE approval criteria than they did in the HSCC reforms. Firstly, Qualifications Wales, following the challenges faced in the HSCC reforms, closely managed the process of developing CBE approval criteria (with extensive involvement from the CITB) rather than fully delegating the responsibility to engage with stakeholders to sector bodies as happened in the HSCC reforms (see Chapter 5 section 5.2.2). Therefore, Qualifications Wales were able to ensure that learning providers were involved throughout the process. This demonstrates that Qualifications Wales was learning from past experiences and was attempting to involve those who were marginalised in previous reforms (see, for example, Raffe and Spours 2007a; 2007b for a discussion on policy learning in VET systems). Secondly, through the BACH Network, learning providers had an established mechanism in place to

collectively influence the development process, a structure that was not in place in the HSCC sector.

Learning providers were also members of Qualifications Wales' SAG and through the SAG and the BACH Network they had extensive involvement and influence over the process of developing qualification content within the approval criteria as acknowledged by Chris from Qualifications Wales:

I think they had a lot of influence and really that was what we wanted them to have ... they very much shaped what that qualification content should look like. (Chris – Manager, Qualifications Wales)

Rhys and Gavin, from FE Colleges C and D, expressed a similar view and explained that they were extensively involved and consulted primarily through the BACH Network:

The readiness to work with the [FE] sector on the content for the new qualifications ... that has worked well. That was better than HSCC. I think that was good. (Rhys – Senior Manager, FE College C)

I think Qualifications Wales' attitude to try and engage as many people as possible has been really, really good ... we did have quite a lot of input into the reforms ... BACH was one of the loudest voices. (Gavin – Curriculum Manager, FE College D)

A specific example of the influence exerted by FE colleges and the BACH Network was with Qualifications Wales' designations policy<sup>21</sup>. Qualifications Wales' original proposal was that the new level 2 and 3 qualifications would be the only qualifications available in the sector to learners in Wales, and that many CBE related level 1 qualifications would no longer be eligible for public funding. However, FE colleges – through the BACH Network – disagreed with this approach as they wanted a range of level 1 qualifications to continue to be eligible for funding as they believed that other

<sup>&</sup>lt;sup>21</sup> Qualifications Wales' designations policy is the approach that is followed to designate a qualification as eligible for use on publicly funded programmes of learning in Wales.

qualification options were needed alongside the new CBE qualifications. Therefore, they put pressure on Qualifications Wales to change their approach:

I think the colleges were very influential on our designations policy for construction ... the colleges very forcefully put forward the case that they needed level 1 qualifications to prepare learners who were not yet going to be ready to get onto the Foundation qualification ... I think they were very, very strong in the influence they exerted over where we've landed on level 1 designation. (Chris – Manager, Qualifications Wales)

The readiness to work with the [FE] sector on the programme for learning funding [designations approach] that we'd have to work with, that has worked well. (Rhys – Senior Manager, FE College C)

As a result, Qualifications Wales consulted with learning providers and agreed to change their approach and retain most level 1 qualifications. This demonstrates a desire from Qualifications Wales to respond to feedback from FE colleges as well as the influence that can be exerted by established networks such as the BACH Network.

Although the BACH Network was extensively involved, some members of the Network continued to resist the reforms, demonstrating conflicting views even within one type of stakeholder group (see, for example, Lindell 2004; Oliver 2010; Deissinger and Gonon 2016; for a related discussion on balancing stakeholder interests in VET systems). It was the view of Angela and Chris from Qualifications Wales that representatives from some FE colleges continued to be dissatisfied throughout the reforms:

Even though they [BACH Network] have a vote on something and move on you'll still get those who are less happy would still keep going on about why they were less happy. (Angela – Senior Manager, Qualifications Wales)

That the vote had passed and therefore they all contributed and chipped in, even though you know, it was clear that not everyone in that room was as bought in as others. (Chris – Manager, Qualifications Wales)

The main aspect of the reforms that some FE colleges continued to resist was the decision to introduce the dual trade requirement in the new Foundation qualification. Despite this, Qualifications Wales continued with it for FE which contrasts with the decision made to remove the requirement from qualifications designed for use on apprenticeships following pressure from the CITB (see Section 6.2.2). Gavin from FE College D, therefore, explained that some FE representatives felt that their views and interests were not fully considered in this decision:

There was a lot of discussion and debate about the whole multiskilling part of it which is the big change ... somewhere along the way a lot of discussions had happened without us, and it came back and that was quite obviously a fait accompli. It felt like perhaps the process had got away from us for a little while and moved on in consultation with others. (Gavin – Curriculum Manager, FE College D)

As such, despite learning providers being extensively involved and influencing elements of the reforms (such as the designations policy and the content within the approval criteria), they could not exert a comparable level of influence as the CITB could over major decisions.

Chapter 5 (Section 5.4.2) explained that there was limited engagement between representatives from Qualifications Wales and the C&Q Group of senior staff at FE colleges during the HSCC reforms. According to Chris from Qualifications Wales and Gavin from FE College D, this also seems to have been the case during the early stages of the development of CBE approval criteria:

It was at a slightly later date as well that we had more engagement with the senior, like really senior, colleagues in the FE providers. (Chris – Manager, Qualifications Wales)

It really appeared that the C&Q Group weren't aware of as much as they needed to be until quite late in the day. (Gavin – Curriculum Manager, FE College D) As the reforms progressed, Dafydd from Qualifications Wales explained that they identified the need to engage more with the C&Q Group following the challenges they faced during the HSCC reforms (see Chapter 5 Section 5.4.2):

I think within construction it was quite a different approach to the engagement with the colleges ... we've used the C&Q Group, which is a group set up by ColegauCymru which has all of the senior representatives from all the colleges thinking about deliverability, manageability issues and all those things around that, how they are delivering education to learners. (Dafydd – Senior Manager, Qualifications Wales)

Qualifications Wales representatives attended C&Q Group meetings to provide updates on the CBE reforms and to seek feedback from the group. They also invited the C&Q Group to nominate an individual to represent the strategic voice of FE colleges during the reforms, an action that was not taken during the HSCC reforms. This provides further evidence that Qualifications Wales were learning from past experiences and strengthening their relationship with learning providers in Wales. As a result, it was the view of Victoria from ColegauCymru that there was closer engagement between Qualifications Wales and the C&Q Group during the reform of CBE qualifications than in the HSCC reforms:

I think the construction reform seems to have gone more through the C&Q Group at an earlier stage than HSCC ... it seemed that there had been some lessons learnt from some of the challenges of HSCC. (Victoria – Senior Manager, ColegauCymru)

The evidence in this section suggests that a range of learning providers were included in the CBE sector review and were consulted on the reform proposals. Learning providers, in particular FE colleges, were also extensively involved in, and influenced elements of, the process to develop CBE approval criteria, in particular shaping the content of the new CBE qualifications. But it appears that learning providers had less influence than the CITB over the structural decisions of the qualifications such as the contentious decision to introduce a dual trade requirement within the new Foundation qualification. Nevertheless, the prominent role of learning providers contrasts starkly with the HSCC reforms in which representatives from learning providers had almost no involvement or influence in the development of HSCC approval criteria. The influence of established networks was important as an enabler to bringing together representatives from FE colleges. There is also evidence that Qualifications Wales, as a new organisation, were beginning to learn from past experiences by taking action to establish stronger relationships with learning providers.

## 6.4. Employers and the reform of CBE qualifications

#### 6.4.1. Employers and the CBE sector review

A diverse range of employers operate in the CBE sector in Wales, with over 95% of them being SMEs (Welsh Government 2023c). The CBE sector review report outlined that more than 110 employers were interviewed during the review (Qualifications Wales 2018a). Angela from Qualifications Wales explained that they learnt lessons from the HSCC sector review and identified that they should have engaged more employers in the CBE review. Therefore, they set themselves a target of interviewing over 100 employers which included large employers, SMEs and micro businesses:

We were conscious that we, perhaps, for HSCC hadn't involved as many employers as we would have liked to ... we wanted to address that perceived weakness in construction and so we set ourselves quite a challenging target of 100 employers ... so we upped the number of employers and we exceeded that target. (Angela – Senior Manager, Qualifications Wales)

This study identified three primary reasons why Qualifications Wales engaged more employers in the CBE sector review than they did in the HSCC review. Firstly, the diverse number of trades in the CBE sector and the vast number of employers, many of which are SMEs and micro businesses, meant that more employers needed to be involved to represent the different trades across the CBE sector in Wales. Secondly, Qualifications Wales seconded a sector adviser from the CITB who had close links with industry and was able to encourage employers to participate in the sector review (see Section 6.2.1). Thirdly, Qualifications Wales better utilised the existing employer networks of bodies such as the CITB and the Electrical Contractors' Association to access employers who would be willing to participate in the review as outlined by Mohamad from the Electrical Contractors' Association:

Our role was to bring in the employers ... I would say getting members involved from their perspective as employers worked well. (Mohamad – Senior Manager, Electrical Contractors' Association)

Mari from a large national employer and Jonathan from a SME spoke positively about their involvement in the CBE sector review. They explained that they were part of Qualifications Wales' SAG and felt they had a voice in the review:

I think the review was well received. I felt the review was a fair reflection on the information that we'd given. (Jonathan – Senior Manager, Employer F)

Yeah, absolutely I do [feel that the voice of employers was represented during the CBE sector review] ... I would just say that we had ample opportunity to be involved. (Mari – Manager, Employer I)

However, despite feeling that they had a voice in the review, it appears that the influence of employers was limited to sharing their views during interviews, SAG meetings and a public consultation, rather than having a platform to influence the recommendations from the review as the CITB and BACH Network had. Therefore, although more than 110 employers of varying sizes, sectors and trades were involved in the sector review, their platform and power to influence was limited.

## 6.4.2. Employers and the development of CBE approval criteria

The extant literature highlights the prominent role given to employers in vocational reforms, particularly in England, but also draws attention to the challenges of engaging industry, particularly SMEs, in qualification reforms (for example, Gleeson and Keep

2004; Laczik and White 2009; Huddleston and Laczik 2018). This study provides further evidence of these challenges in the development of VQs. Dafydd from Qualifications Wales and Hugo from EAL explained the difficulties of maintaining the engagement of employers throughout the development process:

It was challenging to get SMEs. You often get some of the bigger employers or some of the hybrid employers that also kind of offer apprenticeships ... perhaps we didn't always have a true representation of the small to medium employers. (Dafydd – Senior Manager, Qualifications Wales)

I think that the employers have been the challenge. Really, getting through to employers, particularly with the nature of this sector, it's all very small employers, very few large employers at all, and getting through to them was difficult. (Hugo – Manager, EAL)

Participants from industry explained some of the reasons why employers, particularly SMEs, struggled to engage in the development of CBE approval criteria. Jonathan from a SME and Mari from a large national employer, claimed that a lack of time, limited human resources and the competing demands on employers' time and resources were some of the reasons why employers struggled to participate, reasons that have been reported elsewhere (see, for example, Raggatt and Williams 1999; Payne 2008; Ertl and Stasz 2010; Raffe 2015):

I think the employers had the opportunity, yes, but sometimes they didn't have the resource to commit to some of these reviews. (Jonathan – Senior Manager, Employer F)

I think it's really tricky because, you know, there are so many organisations trying to engage with businesses and businesses have a day job. (Mari – Manager, Employer I)

Nevertheless, a range of employers participated in the development of CBE approval criteria, more than it appears were involved in the HSCC process (see Chapter 5 Section 5.3.2). Interviewees from Qualifications Wales explained that they consulted with employers either directly or through SAG meetings. Dafydd from Qualifications Wales

suggested that they learnt lessons from the HSCC reforms – where they felt they had allowed SCW and HEIW too much control to influence the engagement with industry (see Chapter 5 Section 5.2) – and took responsibility for the direct engagement with employers during the CBE reforms:

Members of the team have done a lot of the engagement with employers, and I think we have really brought them on the journey. I think we did achieve that much better in construction than we did in HSCC. (Dafydd – Senior Manager, Qualifications Wales)

Employers interviewed for this study supported this view and indicated that they felt they had a voice in the development process. For example, Jonathan and Dewi from Employers F and G explained that they attended SAG meetings and had opportunities to provide feedback on the draft CBE approval criteria:

There have been some really good employers that are giving up a lot of their time for these stakeholder meetings ... employers had every opportunity ... we had a voice. (Jonathan – Senior Manager, Employer F)

I've been privileged enough to look at the new syllabus ... I actually felt that we were well listened to. I really felt that the things we said were listened to, because when we had the feedback from you, everything that I asked for was there. (Dewi, Senior Manager, Employer G)

A key reason why Qualifications Wales could involve more employers in the development of CBE approval criteria was that they utilised the links that sector bodies had with employers. This seems, to an extent, to challenge the literature that highlights the weak links between employers and the bodies that represent them (see, for example, Payne 2008; Malik 2022). Mohamad, a Senior Manager from the Electrical Contractors' Association, and Mathew from the CITB, explained that they engaged employers in the development work by sharing information with their members, bringing together employers to share feedback on the draft approval criteria, and recommending industry representatives to be part of Qualifications Wales' SAG:

Our role was to bring in the employers ... I think we've done more [employer engagement] than we've ever done in the past ... I would say getting members involved from their perspective as employers that are going to be reviewing the work of their apprentices on-site with the training providers, I think bringing them onboard has worked quite well with industry. (Mohamad – Senior Manager, Electrical Contractors' Association)

I would say getting members involved from their perspective as employers that are going to be reviewing the work of their apprentices on-site with the training providers, I think bringing them onboard has worked quite well. (Mathew – Senior Manager, CITB)

A specific example of the influence exerted by employers was with the new roofing qualifications. Qualifications Wales, with the support of the CITB, brought together employers to seek their views as to whether it would be appropriate to use the level 3 National Occupational Standards for the new apprenticeship qualifications. Employers from most trades agreed, apart from roofing employers:

The roofers told us that if you use level 3 it is just not going to be representative of the work that most people do in Wales so roofing has got a bit of a unique status in the qualifications suite, in that it is a level 3 qualification, but it is only using what have traditionally been considered the level 2 standards within it, and the other qualifications are a bit different to that. I think that was an example of very useful input that influenced that particular qualification from employers. (Chris – Manager, Qualifications Wales)

The focus on supervisory tasks at level 3, for example, was not considered appropriate. Therefore, the roofing qualifications retained level 2 National Occupational Standards. This demonstrates the influence exerted by employers and the willingness of Qualifications Wales to listen and respond to employer feedback. However, apart from this example which showed employers had some influence, their role was limited to providing feedback on draft approval criteria and sharing their views during SAG meetings. Therefore, similar to the development of HSCC approval criteria discussed in Chapter 5 (Section 5.3.2), it appears that they were supportive yet subordinate actors (to Qualifications Wales and the CITB) throughout the process.

The evidence in this section indicates that employers were involved in greater numbers in the CBE sector review than in the HSCC sector review. Maintaining the engagement of employers was a considerable challenge, although more employers were involved in the development of CBE approval criteria than in the HSCC reforms. The established networks/groups of sector bodies – in particular, the CITB and Electrical Contractors' Association – were a key enabler for employer involvement. Further, there is evidence that Qualifications Wales learnt lessons from the earlier HSCC reforms which were applied in the CBE reforms.

#### 6.5. Learners and the reform of CBE qualifications

Learners undertake CBE qualifications primarily in FE colleges, WBL providers and secondary schools, with over 17,000 certificates for CBE qualifications awarded to learners in Wales in 2023/24 (Qualifications Wales 2024). Although learners were not interviewed during this study (explained in Chapter 4 Section 4.5), data was generated on the perspectives of others relating to learner involvement in the CBE reforms. According to the CBE sector review report, Qualifications Wales commissioned an external research company who conducted in-person focus group discussions with more than 900 learners to capture their views about CBE qualifications in Wales (Qualifications Wales 2018a). However, as we saw in the HSCC sector review, their role appears to have been limited to providing feedback on the pre-reform arrangements rather than contributing to the solutions for reform. Moreover, as we saw in the HSCC reforms (see Chapter 5 Section 5.5), there appears to have been no involvement by learners or recently completed learners in the development of CBE approval criteria:

Maybe learners could have been more involved and had a greater role in some of the discussion. (Martyn – Manager, Qualifications Wales)

Learners, very difficult, even more difficult than employers I'm sure, but learners were missing. (Gavin – Curriculum Manager, FE College D)

This finding, which aligns with the evidence from the HSCC reforms, supports previous research highlighting the absence of learners from education reforms (Angus et al. 2013; Elwood 2012; 2013; Elwood and Hanna 2022). However, despite the exclusion of learners from the development of CBE approval criteria, it appears that Qualifications Wales was learning lessons from the HSCC and CBE reforms. Since the CBE reforms, Qualifications Wales has established a Learner Advisory Group to advise them during their work as explained by Dafydd from Qualifications Wales:

I think the other one is learners ... I think we have got better at engaging with learners now we have got things like our Learner Advisory Group ... but I think that's the other group that we perhaps need to do more work with. (Dafydd – Senior Manager, Qualifications Wales)

The evidence in this section indicates that learners, despite being involved in the CBE sector review, were not included in the development of approval criteria for new CBE qualifications, a finding identical to that found in the reform of HSCC qualifications discussed in Chapter 5 (Section 5.5). As we saw in the HSCC reforms, learners were again excluded from the development of new VQs and did not have an opportunity to influence developments. The exclusion of learners raises further questions about Qualifications Wales' claim that learners are at the heart of the reforms as will be discussed in Chapter 7 (Section 7.3.4).

## 6.6. Unions and the reform of CBE qualifications

## 6.6.1. Education unions

The evidence from this study indicates that, as in the HSCC sector review (Section 5.6.1), education unions were not interviewed during the CBE sector review nor were they invited to be part of Qualifications Wales' SAG. They were also not included in the

development of CBE approval criteria. However, Carys, from Education Union A, claimed that she was regularly updated throughout the CBE reforms and said that, through Qualifications Wales' TURO, she had opportunities to share her views:

I feel that we had a lot of information about what was happening and opportunities to give our opinion and influence. (Carys – Policy Officer, Education Union  $A^{22}$ )

In contrast, James from Education Union B, indicated that his union were not invited to participate in the CBE reforms, despite them having an appetite to participate, and he therefore felt that his union, and its members, could be better involved in VQ reforms:

Not a great role in the CBE reforms ... I get the impression there hasn't always been the most constructive relationship [with Qualifications Wales]. (James – Policy Officer, Education Union B)

James suggested some of the ways that his union and their members could be engaged in future VQ reforms including nominating members from their unions who have an interest in CBE qualifications and could contribute to the development of the new qualifications, therefore providing a mechanism for the voice of their members to be included:

We could convene a number of round tables, also bring in external experts to work with ... we can actually convene these conversations, those expertise from amongst our membership and bring individuals in. (James – Policy Officer, Education Union B)

It therefore appears that education unions were updated on the progress of VQ reforms through the TURO Group but had little opportunity to influence developments.

<sup>&</sup>lt;sup>22</sup> Quote translated from Welsh.

#### 6.6.2. Sector trade unions

As with the HSCC reforms, sector trade unions were not involved in any aspect of the CBE reforms. Chris from Qualifications Wales explained that sector trade unions were not considered for inclusion in the reforms because representatives at Qualifications Wales had not established links with trade unions, and did not seem to have considered that it was important to involve them:

It really wasn't a factor in the planning that we did for the project ... there was probably a gap in our thinking really about the trade unions. (Chris – Manager, Qualifications Wales)

Colin, Policy Officer at Trade Union B, representing workers across the CBE sector in Wales, reported that he was not invited by Qualifications Wales to participate in the reform of CBE qualifications. However, he had received information from the sector bodies that he works with, such as CITB and the Electrical Contractors' Association, and through his role on sector specific boards and groups such as the Joint Industry Board<sup>23</sup> and the Electrotechnical Certification Scheme<sup>24</sup>:

I never received a direct invitation to become engaged [in the reform of CBE qualifications] ... but as I say it did filter through to me anyway, through my other roles. (Colin – Policy Officer, Trade Union B)

This suggests that Colin was indirectly informed about the reforms but was not given a platform by Qualifications Wales to be involved in, or influence, the process. It could be argued that this was a missed opportunity by Qualifications Wales and reflects the wider exclusion of trade unions in the VET system over the past 40 years (Keep et al. 2010; Stuart and Huzzard 2017; Stuart 2019; Vossiek 2019) and will be further discussed in Chapter 7 Section 7.3.1.

<sup>&</sup>lt;sup>23</sup> The Joint Industry Board sets the standards for employment, welfare, grading and apprentice training in the electrical contracting industry.

<sup>&</sup>lt;sup>24</sup> The Electrotechnical Certification Scheme accredits the qualifications and experience of workers in the electrotechnical industry.

## 6.7. Conclusion

This chapter has established that, like the HSCC reforms discussed in Chapter 5, stakeholders such as sector bodies and employers were involved in the CBE sector review and the subsequent development of approval criteria for new CBE qualifications but levels of involvement and influence were very uneven. CITB was an influential actor in the reforms as were FE colleges through their established BACH Network. The CITB – backed by their role as the sector body for the construction industry in Wales, their role as the Welsh Government's apprenticeship development partner and underpinned by sufficient human and financial resources – was a central actor and exerted significant influence throughout the process. FE colleges – through their BACH Network – were also very influential, particularly in the development of content within the approval criteria which contrasts with their marginalisation in the development of HSCC approval criteria discussed in Chapter 5.

Other stakeholders were involved in the reforms but their opportunity to influence varied. For example, employers and other sector bodies (for example, Electrical Contractors' Association) were involved in the sector review and the development of CBE approval criteria but their influence was mainly limited to providing feedback on draft approval criteria rather than influencing the structure of the qualifications. In contrast, specific interests and voices – for example, learners and sector trade unions – were excluded from the development of CBE approval criteria as they were in the HSCC reforms. There is some evidence to suggest that those working in Qualifications Wales were learning from their experiences of the HSSC reforms to strengthen stakeholder engagement in the CBE sector. This will be discussed in the next chapter in relation to the ideas of organisational memory and policy memory.

In the next chapter data presented in this chapter and in Chapter 5 will be analysed, drawing out the main findings from the study in relation to the extant literature.

# Chapter 7 – Discussion – Stakeholder involvement and influence in the reform of VQs in Wales

## 7.1. Introduction

This chapter considers the data presented in Chapters 5 and 6 and discusses the key findings, drawing out the main contributions that emerge from the research in relation to the extant literature. The findings deal with the overall research aim which is to *explore the extent of stakeholder involvement and influence in the reform of VQs in Wales*. More particularly, it considers the role of stakeholders in the context of the sector reviews and the process of developing approval criteria for new VQs in the HSCC and CBE sectors.

In the discussion that follows, it is argued in two principal ways that despite apparent attempts by Qualifications Wales to involve stakeholders in the reform of HSCC and CBE qualifications, the formal networks, arrangements and mechanisms necessary to facilitate the involvement of all stakeholders are not yet in place in Wales or they have unstable and seemingly weak foundations. First, Qualifications Wales, as a very new organisation, had yet to put in place the structures and mechanisms to include and balance a range of interests in the reform of VQs. This same 'newness' meant Qualifications Wales had yet to develop strong organisational memory and related policy memory necessary to learn from past experiences and to manage effective relationships with stakeholders in the VET system in Wales. Relatedly, numerous changes with regard to the organisations responsible for the reform of VQs – for example, three different qualifications regulators between 2001 and 2015 – has created a level of instability and something of a weak basis for facilitating change.

Second, there is the marginalisation of specific groups of stakeholders from national reforms, as well as a lack of (social partnership) arrangements in Wales that would provide a platform for wider stakeholder engagement. Key groups' (e.g. learners, workers and trade unions) perspectives *continue* to be overlooked and excluded, which

can be attributed, in part, to a legacy of policy decisions made by the UK Government in the 1980s and 1990s, prior to education being devolved to the Welsh Government. The chapter is organised as follows, drawing out the two main arguments articulated above across three areas. Section 7.2 explores some of the *competing views and interests* observed in the reforms. It sets out the context to the discussion (and the argument) that the absence/weakness of mechanisms to balance competing interests in Wales meant that stakeholder involvement and influence was very uneven with some stakeholders excluded from the process. Section 7.3 discusses the *patterns of stakeholder inclusion/exclusion and influence*, with a specific focus on trade unions, employers, learning providers and learners. Section 7.4 analyses the role of Qualifications Wales and argues that a lack of *organisational memory* and related *policy memory* meant they were ineffective in balancing stakeholder interests. The reasons why there has been such instability to the organisations responsible for the reform of VQs in Wales over the past 25 years is also explored. Finally, the *conclusion* is presented in Section 7.5.

## 7.2. Competing views and interests

The benefits of stakeholder involvement in education/qualification reforms are widely acknowledged (Finlay 1998; OECD 2010; Ranson 2018) but this chapter does not naively claim that involvement and influence in VQ reforms is, or should be, distributed equally between stakeholders. To do so would be to ignore the enablers and constraints that shape levels of involvement and influence such as access, wealth, capacity, human and/or financial resources (Finlay 1998; Ertl and Stasz 2010; Bettencourt et al. 2024). Moreover, the VET system – which is expected to serve a range of stakeholder interests – is pulled in multiple directions (Clarke and Winch 2007; Bathmaker 2013). As such, it is likely there will always be an imbalance in the levels of stakeholder involvement and influence, as will be discussed throughout this chapter. Nevertheless, that does not mean that greater levels of inclusion and equity cannot, and should not, be sought. This is arguably achieved in countries with 'collective skill

formation systems' and what might be claimed to be stronger VET systems such as Germany, Austria, Denmark and the Netherlands (Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020).

Chapters 5 and 6 detailed the range of stakeholders involved in the reform of HSCC and CBE qualifications, but the evidence indicates that it was a significant challenge for Qualifications Wales to negotiate and balance competing views and interests. For example, the dual trade requirement in the level 2 Foundation qualification in the CBE reforms reflected the interests of Qualifications Wales to broaden the development of skills but was strongly resisted by the CITB and some learning providers who value trade and/or firm specific skills and did not want to depart from the status quo (see Chapter 6 Sections 6.2 and 6.3). Within the BACH Network there were competing views with some supporting the dual trade approach whilst others strongly resisted. Similarly, the change to the size of the level 3 childcare qualification proposed by Qualifications Wales, and supported by SCW, was resisted by FE colleges and later overturned, demonstrating the competing views and perspectives of different actors involved in the reform process as well as the significant influence exerted by some stakeholders (see Chapter 5 Section 5.4.2).

The findings draw attention to the challenges that Qualifications Wales faced when managing the VQ reform process whilst negotiating the competing perspectives to find compromise and arrive at any type of consensus. However, what was starkly illustrated, as others have also found when commenting on similar processes (for example, Finlay 1998; Lindell 2004; Clarke and Winch 2007; Huddleston and Laczik 2018), is that divergent agendas are difficult to reconcile. Indeed, the VET system – which is expected to serve a range of stakeholder interests – represents a compromise between different stakeholders but also reflects the power associated with each interest group (Clarke and Winch 2007). Therefore, as identified by this study, influence is often unevenly distributed and compromise will be based primarily on the interests

of those who are included/involved (and have a voice) in the governance of the VET system and that influence is not (and will always be difficult to be) equally distributed. Further, for stakeholders to be involved in the governance of VET often requires mechanisms and organised groups/networks to represent their interests and to access the decision-making process (Lindell 2004; Thelen and Busemeyer 2012; Trampusch and Eichenberger 2012). As a new actor entering the VET system, this challenge was compounded given Qualifications Wales' newness and inexperience of collaborating with other actors in the VET system in Wales (see Section 7.4). As such, it may have been an unrealistic expectation by Qualifications Wales, hindered by a lack of experience and policy memory of past reforms, to set out to develop VQs that would satisfy the needs and interests of such a diverse range of stakeholders.

## 7.2.1. Absence/Weakness of mechanisms to balance stakeholder interests

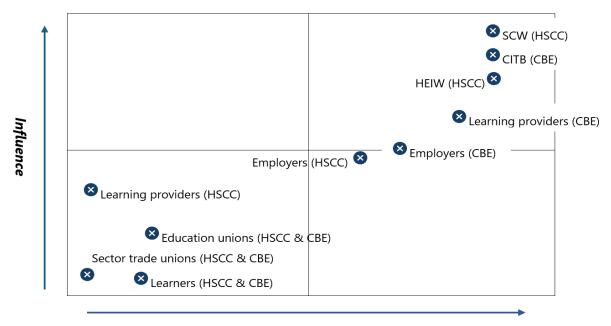
The evidence from this study indicates that a key barrier to involvement identified in the findings of this thesis was the absence/weakness of mechanisms to bring together a range of stakeholder interests and voices on inclusive terms in the VQ reform process, especially when compared with countries such as Germany, Denmark, Switzerland and Austria. As will be further discussed in Section 7.4, mechanisms for supporting collaboration and partnership in the reform of VQs in Wales are weak and fragmented. This is not to say that evidence of collaboration and partnership in the reforms was entirely absent. For example, the BACH Network provided a platform for collaboration between FE colleges in the CBE sector, and SCW's Qualifications and Standards Advisory Group brought together stakeholders to review and approve qualifications to be accepted on SCW's regulatory frameworks. Further, ColegauCymru's C&Q Group was a mechanism for senior staff from FE colleges to collaborate. But these different groups/networks are fragmented across sectors, tend to represent the interests of only one type of stakeholder and do not feature within a cohesive, formal mechanism/system that brings together a range of different interests (and voices) in the process of reforming VQs in Wales.

In the absence of effective mechanisms to balance competing interests, Qualifications Wales put in place SAGs to bring together different interests, but a weakness is that some stakeholders were absent or underrepresented in these groups (for example, trade unions and learners). Although the SAGs appear to have been a vehicle for sharing information and seeking views from those involved, the evidence indicates that they were ineffective in terms of providing a range of actors with a voice on relatively inclusive terms. For example, the HSCC SAG included SCW, HEIW, Qualifications Wales and awarding bodies but there was no representation from learning providers, trade unions or learners. The ineffectiveness of SAGs at providing a range of stakeholders with a voice on relatively inclusive terms meant that some stakeholders felt that their views and interests were not fully considered during the development of new VQs, as will be discussed in Section 7.3.

This contrasts with other Northern European countries with what I have stated previously are argued to be strong VET systems (see Chapter 3 Section 3.2.3 for a discussion on the strengths of collective skill formation systems) that have formal arrangements and regulations in place to ensure the interests of different actors are considered on more inclusive terms (Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020). This is not to say that conflict or dissent does not exist during vocational reforms in these countries, but the formal mechanisms and social partnership arrangements in place means that they can better balance competing interests, negotiate, resolve conflict and seek consensus. This appears not to be the case in Wales, where the formal mechanisms to support the involvement of, and collaboration between, stakeholders in the reform of VQs remain underdeveloped as will be discussed in the next section.

## 7.3. Stakeholder inclusion, exclusion and influence

This section develops the discussion further by exploring which stakeholders were involved, and had influence, in the reform of HSCC and CBE qualifications and the reasons why some had greater levels of engagement than others. Figure 4 is a representation of the estimates of involvement and influence of different stakeholder groups in the reforms. The top right quadrant shows those stakeholders who had the greatest involvement and influence in the reforms such as SCW, HEIW and the CITB. In contrast, the bottom left quadrant shows those stakeholders – such as learners and sector trade unions – who had little involvement and influence. Whilst Qualifications Wales included a range of stakeholders, the levels of involvement and influence were very uneven. For example, the greatest involvement and influence in both reforms came from those actors – such as SCW, HEIW and the CITB – with a strong position in the sector, possessing the networks and mechanisms to represent their interests, and supported by human and financial resources dedicated to Wales. In contrast, those without the resources, arrangements and organised networks/groups to represent their interests – such as learners – became sidelined or excluded.



## Involvement

Figure 4 - Estimates of stakeholder involvement and influence in reform of VQs in Wales

## 7.3.1. The absence of trade unions

According to the Welsh Government (2024a), social partnership is well established in Wales but, in the context of the VET system, this claim seems highly questionable. Education unions were provided with updates on the progress of the reforms through Qualifications Wales' TURO Group (see Chapters 5 and 6 Sections 5.6.1 and 6.6.1). However, this group does not include employer representation and was primarily used as a mechanism to share information. It cannot, therefore, be considered as a form of social partnership, albeit it does show a willingness from Qualifications Wales to engage with education unions but in a relatively limited way. Further, this thesis did not identify any examples of influence by the TURO Group and, beyond this, education unions had no specific involvement in the reforms. They were not interviewed by Qualifications Wales during sector reviews, included on the SAGs, or invited to contribute to the development of approval criteria for new VQs. As illustrated by Figure 4 (bottom left quadrant), the findings clearly indicate that education unions had little involvement and, as such, very limited influence on the process of reforming VQs in Wales.

Similarly, sector trade unions (Figure 4 bottom left quadrant) were not included in the sector reviews or the subsequent development of approval criteria for new VQs (see Chapters 5 and 6 Sections 5.6.2 and 6.6.2). Despite the potential benefits of including trade unions (see Cooney and Stuart 2012; Young and Hordern 2022), senior representatives from Qualifications Wales did not consider sector trade unions to be stakeholders who could contribute to, and therefore should be involved in, the reform of VQs. Their explanation for the exclusion of unions did not go beyond simply stating that they had not been considered during the planning and implementation of the reforms, and so the reasoning for their exclusion remains opaque. However, in addressing research question 3 and explaining any differences in stakeholders' involvement and influence, the extant literature suggests that the exclusion of trade unions can be traced back to decisions made by the UK Government in the 1980s and

1990s, as discussed in Chapter 3 (Keep 2007; Keep et al. 2010; Rainbird 2012; Stuart and Huzzard 2017; Stuart 2019). For these reforms, the legacy of neoliberalism, manifested in the marginalisation of collective voice, remains identifiable in education policymaking in Wales. It could be argued that, as evidenced by the findings of this thesis, the exclusion of trade unions in the VET system has become so embedded and normalised that influential public bodies such as Qualifications Wales do not consider trade unions as stakeholders who can contribute to, and should be included in, their work.

This exclusion appears to be contrary to the intent of Welsh Government to adopt some type of social partnership model in Wales. The Social Partnership and Public Procurement Act – introduced following the data collection for this thesis – is a notable step to embed Welsh Government's social partnership ambitions in law (Welsh Government 2023b), but curiously fails to mention trade unions and employer representatives with regard to education and training. Moreover, as the findings of this thesis highlight, there is a more general absence of the institutional frames and mechanisms that would support social partnership – and certainly any overtures in this direction fall well short of what is evident across many northern European countries (Emmenegger and Seitzl 2020).

For example, although there are Regional Skills Partnerships, sector and employer bodies (including the remaining Sector Skills Councils) and employer groups, such as the CBI and the Federation of Small Businesses, they do not compare with the strong institutions that represent the interests of employers, such as the Chamber of Commerce and Industry in Germany and the Chamber of Commerce in Austria (Pernicka and Hefler 2015; Emmenegger et al. 2019). Nor are there strong trade unions and institutions that represent the interests of workers in the governance of the VET system in Wales as are in place in Germany, Austria, Denmark and the Netherlands (Emmenegger and Seitzl 2020). These weaknesses are arguably features in other liberal market economies such as the USA, Australia and Canada where weak institutional

infrastructures do not provide the mechanisms for stakeholders to have a voice on relatively inclusive terms in the VET system (Bosch and Charest 2009; Fortwengel et al. 2019; Vossiek 2019).

Further, in Wales, representatives of employers and workers do not feature within a cohesive VET governance system (alongside other interests) that resemble the institutions, boards and committees that bring together a range of interests in collective skills formation systems. For example, the Alliance for Initial and Further Training, the Committee for VET, and the Board of the Federal Institute for VET provide the basis for social partners to have a say on a more equal basis in the governance of all levels of the German VET system (Busemeyer and Trampusch 2012; Emmenegger et al. 2019). Similarly, the Federal Advisory Board on Apprenticeships in Austria and the VET Councils in Denmark bring together trade unions, employer associations, learner representatives and representatives from vocational schools in the governance of VET (Emmenegger and Seitzl 2020).

Despite a range of groups/networks, bodies and institutions (for example, Qualifications Wales' SAGs and TURO, Regional Skills Partnerships, sector bodies including Sector Skills Councils, trade unions) that represent different stakeholders in Wales, they do not add up to a cohesive governance system that brings together a range of actors in the process of reforming VQs in Wales. The fragmentation of stakeholder groups/networks is not helped by the absence of a national strategy for VET from the Welsh Government, as acknowledged in the recent Review of VQs in Wales (Welsh Government 2023a). As such, the evidence of this thesis indicates that there is a lack of clarity about the expected roles and responsibilities of different actors in the VET system in Wales, alongside an absence of mechanisms that would provide a platform for wider stakeholder engagement. The absence of these mechanisms (and the lack of general social partnership arrangements) means that, as evidenced by this thesis, it is the Welsh Government and public bodies such as Qualifications Wales, SCW, HEIW and the CITB who hold most of the power in the governance of the VET

system in Wales. Such actors have considerable discretion over how vocational reforms are administered, with few stakeholders who can challenge this authority.

## 7.3.2. Capturing the elusive employer voice

A range of employers were involved in both sector reviews, particularly the CBE review which included interviews with more than 110 employers. However, the evidence indicates that their role was limited to providing feedback on the current arrangements (pre-reform) rather than anything that could be constituted as having agency in the process. Employers were also involved in the subsequent development of approval criteria for new HSCC and CBE qualifications but in most cases their role was limited to providing feedback on the content of approval criteria developed by Qualifications Wales, sector bodies and/or awarding bodies, rather than contributing to the structural design of the qualifications.

There is an abundance of literature that explores the involvement of employers in VQ reforms in England (for example, Huddleston et al. 2005; Bathmaker 2013; Haynes et al. 2013; Huddleston and Laczik 2018), but the same cannot be said about Wales. Robson et al. (2024) argue that in Wales there has been some divergence from England (and other parts of the UK) with employers positioned as partners and co-contributors in the VET system. Yet, the term 'partners' is very broad, and Robson et al. (2024) do little to explain how partnership operates in Wales and how it differs from England. In adopting Teisman and Klijn's (2002, p.198) definition of partnership as an attempt to "solve governance problems through cooperation rather than through central steering and control", the findings of this thesis do not support the claim by Robson et al. (2024) that employers are partners. There is evidence that employers were 'co-contributors' to the reforms and were able to influence aspects of the process to develop approval criteria for new HSCC and CBE qualifications (see Chapters 5 and 6 Sections 5.3.2 and 6.4.2). However, as illustrated by Figure 4, their influence appears to have been limited

to a supportive yet subordinate role to other more influential actors (such as Qualifications Wales and sector bodies) of providing feedback on draft approval criteria content.

Previous research focussed on VQ reforms in England also claim that employers were prominent yet subordinate actors (Ertl and Stasz 2010; Huddleston and Laczik 2012; 2018). For example, Huddleston and Laczik (2012; 2018) argue that, despite employers being asked to take a leadership role in England, they were restricted to being supportive actors in the development of 14-19 Diplomas and their influence was mediated by other strong actors, such as the Qualifications and Curriculum Authority. Therefore, it seems that there is little difference between the involvement (and influence) of employers in VQ reforms in Wales when compared with England.

Further, the findings highlight the challenge of involving employers, especially SMEs, in the reform process (see Chapters 5 and 6 Sections 5.3.1 and 6.4.2). Of particular relevance for this thesis is that SMEs form a significant part of the HSCC and CBE sectors. Existing studies point to employer bodies across the UK being weak, poorly resourced and unrepresentative of the views of employers, particularly SMEs, in their sector (Finegold and Soskice 1988; Keep 2006; Payne 2008; Ertl and Stasz 2010; Lloyd and Payne 2021). A succession of government funded bodies (for example, Industry Training Board, Manpower Services Commission, Training Enterprise Councils, Sector Skills Councils) have been established since the 1960s but most were short lived and were arguably abolished once their usefulness to ministers was exhausted (Keep 2007). This led Raffe (2015) to claim that there is a view from employers that the bodies set up to mediate between them and the qualifications process do not effectively represent their interests.

And yet this thesis highlights the strength of some sector bodies in the HSCC and CBE sectors in terms of the influence they exerted and the links they provided between Qualifications Wales, awarding bodies and employers. For example, SCW and HEIW were influential actors and engaged with employers, including SMEs, in the HSCC

sector to seek their feedback on draft qualification content (see Chapter 5 Section 5.2). Similarly, the CITB was a major actor in the CBE reforms and was a key link between Qualifications Wales and employers, including SMEs (see Chapter 6 Section 6.2.2). These bodies had the necessary platform, position in the sector (as the apprenticeship framework development partners contracted by the Welsh Government) and had sufficient human and financial resources focussed on Wales to influence developments.

There is some relevance to Keep's claims (2007, p.162), nearly two decades ago, when referring to similar bodies in England as "creatures of government" that prioritise the interests of the state. These bodies were established and are funded by the Welsh or UK Government to support government objectives and are accountable to government ministers. For example, SCW and HEIW have links with employers but neither was established to represent the voice of employers. Even those that claim to represent employer interests (such as the CITB), are accountable to government ministers and could be abolished by the UK Government if their usefulness is exhausted (examples such as Training and Enterprise Councils and Industry Training Boards demonstrate this claim).

This thesis argues that these bodies, therefore, cannot be considered employer led in the same way that employer associations are organised in some other countries (for example, Germany, Austria and Switzerland) where they are funded by, and accountable to, their members (Trampusch 2010; Emmenegger and Seitzl 2020). As evidenced in this thesis, the involvement of employers in the VET system in Wales is far less formal and coordinated. In Wales, employer bodies do not feature within a cohesive governance system that brings together employer representatives, alongside other interests such as workers and learners, in the VET system which limits their influence. Nevertheless, in the absence of a cohesive system, the sector bodies in the HSCC and CBE sectors proved to be the most effective vehicle available to involve employers in the process of reforming VQs in Wales.

### 7.3.3. Involvement of learning providers

Keep (2015b, p.469) claims that "the norm for many years has been that governments will enact changes to VET without any serious attempt to involve the institutions that deliver VET or those who work within them". However, he does not expand on this claim to outline the implications of their exclusion or provide examples of specific reforms which included/excluded learning providers. In particular, there are very few studies exploring UK qualification reforms that have focussed on the involvement of teachers and representatives from learning providers. The exceptions are those focussed on school based general qualifications (Crick and Priestley 2019; Crick and Golding 2020; Sinnema et al. 2020) or narrowly on involvement at an institutional level (Kirk and MacDonald 2001; Swanepoel and Booyse 2006; Huizinga et al. 2014). As such, this thesis represents a rare example of the exploration of two VQ reforms, one of which excluded the voice of those from learning providers whilst the other highlights their prominent role.

Chapters 5 and 6 (Sections 5.4 and 6.3) – illustrated in Figure 4 – showed how the involvement and influence of learning providers differed between the two reforms. For HSCC, whilst representatives from learning providers were interviewed during the sector review, they were marginalised in the process of developing approval criteria for new HSCC qualifications and in the words of one FE college "we just weren't listened to" (see Chapter 5 Section 5.4.2). However, this arguably led to a number of shortcomings in the design of new HSCC qualifications – for example, the size of the level 3 childcare qualification – that could have been avoided if teachers and representatives from learning providers had been better involved. It seems plausible that involving those from learning providers offering HSCC qualifications (Yates 2012), could have strengthened the design process. As it is, the exclusion of learning providers arguably negated a wealth of human capital and excluded those who,

according to Harris et al. (2017), are best placed to contribute to lasting educational change.

The marginalisation of learning providers in the development of new HSCC qualifications sits in contrast to their involvement in the development of CBE qualifications. The evidence shows that greater efforts were made by Qualifications Wales to involve learning providers in the development of approval criteria for new CBE qualifications (see Section 6.3.2). For example, the BACH Network were involved throughout the reform process and Qualifications Wales better engaged with ColegauCymru's C&Q Group, demonstrating the importance of having long-established networks in place to collectively represent the interests of those from learning providers alongside an improved awareness by Qualifications Wales of the involvement of those from learning providers in the development of approval criteria for CBE qualifications was one of the reasons why fewer changes were needed following their introduction, compared with HSCC (see Qualifications Wales 2023a for an overview of the changes needed to the design of CBE qualifications).

### 7.3.4. Absence of learners in the development of new VQs

### Learners are at the heart of what we do (Qualifications Wales 2023b)

Qualifications Wales' claim that learners are at the heart of their work is highly questionable given their exclusion from the development of approval criteria for new VQs in Wales. Learners were not interviewed during this study (explained in Chapter 4 Section 4.5), but data was generated on the perspectives of others on learner engagement. The evidence indicates that learners were included in the HSCC and CBE sector reviews but their role was limited to providing feedback on the pre-reform arrangements rather than contributing to the reform proposals. Further, the learner voice was absent in the development of approval criteria for new VQs, as shown in

Figure 4. This finding aligns with previous UK research that highlights the absence of learners from discussions and deliberations during education and qualification reforms (Angus et al. 2013; Elwood and Lundy 2010; Elwood 2012; 2013; Elwood and Hanna 2022). Indeed, examples of meaningful engagement with young people in qualification reforms across the UK, particularly at a national level, are rare.

Keep (2015a), when reflecting on the English VET system, claims that past reforms of VQs have done little to involve anyone who might speak on behalf of individual interests. It is the view of Angus (2013) that the focus on involving employers in VQ reforms has marginalised the voice of learners, a view that is supported by others who highlight the prioritisation of employer interests above that of other stakeholders, including learners, in UK educational reforms (Hodgson and Spours 2008; Elwood 2012; 2013; Keep 2015a). However, given the focus on employers in VQ reforms across the UK over the past 40 years, the exclusion of any stakeholder could reasonably put down to the prioritisation of employers over others. A similar conclusion could be drawn from the findings of this thesis (i.e. that the focus on involving employers and sector bodies meant that learners were excluded) yet that does not fully explain the reasons why this is the case.

In addressing research question 3 and explaining the exclusion of particular interests, one possible additional reason for the exclusion of learners was the 'newness' of Qualifications Wales, combined with the instability of organisations responsible for the reform of VQs in Wales over the past 25 years. This meant that Qualifications Wales had not put in place networks and mechanisms to involve learners (further discussed in Section 7.4). Representatives from across Qualifications Wales, including senior representatives, explained the perceived challenges of involving learners given the absence of networks to involve them. Indeed, involving learners – who are a transient and heterogenous group – is complex and problematic (Brand 1998; Bragg 2007; Angus et al. 2013). However, since the HSCC and CBE reforms, Qualifications Wales has established a learner advisory group to support their work (Qualifications Wales 2021).

Although this group was not specifically designed to support the reform of VQs, it suggests a genuine desire (rather than rhetoric) from Qualifications Wales to provide learners with a voice in VQ reforms. Therefore, it could be argued that newness, and an absence of networks and mechanisms to involve learners at the time of the reforms under investigation, were primary reasons why learners were not included in the development of approval criteria for new VQs. It seems that Qualifications Wales' eagerness to begin the development process before the necessary networks and mechanisms to involve learner interests were in place contributed to the exclusion of learners from the process of developing approval criteria for new VQs in Wales.

## 7.4. 'Newness' of Qualifications Wales

The findings suggest that some of the differences in stakeholders' involvement and influence could be attributed to the 'newness' of Qualifications Wales, a lack of organisational memory, and limited policy memory of the difficulties of previous reforms. When Qualifications Wales was established, the complex process of transitioning staff from the Welsh Government to a new sponsored body meant that very few staff moved to Qualifications Wales. This saw new staff recruited at all levels of the organisation, a new Board was appointed and, as such, there was limited memory and experience of undertaking national VQ reforms. Watson (2011, p.413) claims that when institutions and personnel within them change it leads to the loss of memory of past successes, shortcomings and little recollection of "what happened last time we tried this". Certainly, the change of responsibility for the regulation and reform of VQs from the Welsh Government to Qualifications Wales is likely to have led to substantial memory loss. Raffe (2015), when discussing VQ reforms in England, argues that a lack of policy memory should be a reason for policymakers to halt, or at least pause, before embarking on a lengthy reform journey. Yet, despite their status as an independent sponsored body who could begin the reforms when they were ready, no such consideration appears to have been made by Qualifications Wales and they embarked on their first sector review within only a few months of being established.

For Qualifications Wales the implications of a lack of memory were evident in the HSCC and CBE reforms, particularly when reflecting on the extant literature. For example, the number of past reforms to VQs across the UK, and the amount of literature exploring the inadequacies of these reforms (for example, Raggatt and Williams 1999; Hodgson and Spours 2007; Ertl and Stasz 2010; Huddleston and Laczik 2018), illustrates clearly the challenges of implementing fundamental changes to VQs. The evidence of this thesis indicates that some of these inadequacies have been repeated in the reforms under discussion here (for example, challenges of engaging SMEs, marginalisation of learning providers, exclusion of trade unions and learners, and the difficulties of balancing competing interests). Hence, as warned by Raffe (2015), a lack of policy memory means that issues of the past are likely to be repeated.

This is not to say that since being established evidence of organisational learning and policy learning was absent. As the reforms progressed, Qualifications Wales were learning lessons from the HSCC reforms that were subsequently implemented in the CBE reforms. For example, Qualifications Wales planned a longer timeframe to undertake the CBE sector review, appointed a sector specialist to be an advisor and better involved representatives from FE. What these examples begin to highlight is the development (and value) of organisational learning and policy learning, which meant that Qualifications Wales was in a better position to make more informed decisions and judgements.

One clear reason for the lack of organisational and policy memory is the frequent changes to organisations responsible for the reform of VQs in Wales over the past 25 years. Observations by Higham and Yeomans (2007) and Raffe (2015) about the instability of educational policy making institutions in England also arguably apply to Wales. Qualifications Wales is the third organisation responsible for the regulation and reform of VQs in Wales since 2001<sup>25</sup>. There have also been changes to the

<sup>&</sup>lt;sup>25</sup> Previous qualifications regulators in Wales were the Qualifications, Curriculum and Assessment Authority for Wales (2001-2006), and Welsh Government (2006-2015).

organisations responsible for post-16 education and funding in Wales with the newly established Medr being the third organisation responsible for post-16 education in Wales over the past 25 years<sup>26</sup> (Hazelkorn 2016). This contrasts with some other Northern European countries who have retained relative stability in their VET systems. For example, following considerable VET reform in 1994, Norway has seen limited change to the governance arrangements in their VET system (Persson Thunqvist et al. 2019), whilst the German dual apprenticeship system has also remained relatively stable since the 1960s (Deissinger and Gonon 2021). This is not the case in Wales. Indeed, the evidence suggests that frequent change and instability since education was devolved to the Welsh Government has not provided stable foundations for qualifications regulators to develop strong memories which has hindered effective involvement of stakeholders in the process of reforming VQs in Wales.

Keep (2006), when referring to the governance changes in the English VET system in the early 2000s, asserts that the changes reflect the political process rather than the needs of the VET system and those who work within it. Coffield (2024) takes a similar view and claims that the changes in England reflect the 'hyperactivity' of ministers and senior policy officials. There is relevance to these claims when considering the institutional changes in Wales over the past 25 years. Despite relative political stability in Wales, with the Labour party being the dominant political party since devolution, the short-termism of politicians and policymakers also arguably applies to Wales. Many commentators have explored the short-termism of policymakers and public institutions in democratic countries and have asked the question whether or not they are capable of addressing long-term problems (Shearman and Smith 2007; Garri 2010; Jacobs 2011; Ward 2011). Indeed, MacKensie (2016) asserts that politicians have strong incentives to implement policies which will have noticeable net benefits in the short

<sup>&</sup>lt;sup>26</sup> Organisations responsible for post-16 education in Wales were Education and Learning Wales (2000-2006), Welsh Government's Department for Children, Education, Lifelong Learning and Skills (2006-2024) and Medr (2024-).

term and equally strong incentives to avoid longer-term policies which are costly in the short term.

Over the past 10 years (2014-2024) there have been four education ministers in Wales (and 11 in England), each minister arguably trying to implement their own short-term policies with little incentive to implement longer term policies which go beyond their own time in office. Restructuring of government bodies responsible for elements of the VET system (such as the establishment of Qualifications Wales), as well as reforms to VQs, can be realised in a relatively short period of time and, as such, are those changes which have been most frequently made in Wales (and England) over the past 25 years. In contrast, significant change to the structure and governance of the VET system (for example, developing a qualifications system that is independent from England and brings together stakeholders in a more inclusive way in the governance of the system) – which would take many decades to realise – may go beyond the types of interventions that Welsh Government ministers and public bodies are willing to make.

## 7.5. Conclusion

This chapter has explored how and in what ways stakeholders were involved in, and influenced, the reform of VQs – using two recent VQ reforms in Wales as the focus of the thesis. In addressing the research questions, the evidence indicates that a range of stakeholders were involved in both the HSCC and CBE sector reviews and the subsequent development of approval criteria for new VQs. Yet, the evidence indicates that levels of involvement and influence were very uneven. Those with networks/groups to represent their interests, and the necessary human and financial resources dedicated to Wales to influence developments, were involved and influenced the reforms. In contrast, those without the necessary resources, arrangements and networks/groups to represent their interest, were marginalised or excluded.

The findings highlight the differing views and interests of stakeholders involved in the reforms and the challenges faced by Qualifications Wales when attempting to negotiate the competing perspectives to find compromise and arrive at any type of consensus. It also draws attention to the absence/weakness of formal networks, arrangements and mechanisms necessary for a range of interests and voices to be included in relatively inclusive ways. These arrangements are in place in other countries with arguably stronger VET systems, as has been indicated, but appear absent/weak in Wales. The newness of Qualifications Wales, a lack of organisational memory and related policy memory, combined with the institutional instability of organisations responsible for the reform of VQs in Wales over the past 25 years, are given as reasons to explain the differences in stakeholders' involvement and influence. Welsh Government's social partnership ambitions, strengthened through the introduction of the Social Partnership and Public Procurement Act in 2023, offers an opportunity to enhance the relationship between actors in the VET system and to move towards a more collaborative model of governance but whether these ambitions extend to the VET system remains to be seen.

The next chapter draws out conclusions, discussing how each research question has been addressed and offers recommendations for policy and practice.

## 8.1. Introduction

This thesis set out to explore the *extent of stakeholder involvement and influence in the reform of VQs in Wales* – using two recent reforms as its focus. This final chapter draws out conclusions, discussing how the research questions have been addressed. It outlines the study's contribution to the field and offers recommendations for policy and practice. Finally, the chapter acknowledges the limitations of the study and suggests areas for further investigation.

## 8.2. Research questions

Drawing on the findings of this thesis, this section discusses how the following research questions have been addressed:

RQ1 – In what ways were stakeholders involved in, and influenced, the sector reviews of VQs in the HSCC and CBE sectors in Wales?

RQ2 – In what ways were stakeholders involved in, and influenced, the process of developing approval criteria for new VQs in the HSCC and CBE sectors in Wales?

RQ3 – What explains any differences in stakeholders' involvement and influence?

In addressing research questions 1 and 2, this study identified an absence of, or weakness in, the networks, mechanisms and arrangements necessary for a range of stakeholders to be included in the process of reforming VQs in Wales, both more generally and specifically with regard to developing approval criteria for new VQs. Although there are structures in place to represent different interests (for example, SAGs, TURO Group, BACH Network, ColegauCymru's C&Q Group, sector bodies), I argue that they are fragmented across sectors and stakeholder types and do not add up to a cohesive governance system that brings together a range of interests and

voices in a relatively inclusive way within the process of reforming VQs in Wales – thus providing some explanations for different levels of engagement. This contrasts with VET systems, such as those in Germany, Denmark and Austria, for example, that operate collective mechanisms, which offer greater levels of inclusion and partnership, and arguably result in stronger VET provision (see Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020).

When speaking to research questions 1 and 2, what is evidenced by this study, is that levels of stakeholder involvement and influence in both reforms were very uneven. The greatest involvement and influence came from those actors – such as SCW, HEIW, and the CITB – that were public bodies, with strong positions in their sectors, possessing the networks and mechanisms to represent their interests, and supported by human and financial resources dedicated to Wales. In contrast, those without the necessary resources and structures to represent their interests – such as learners and trade unions – were sidelined or excluded.

Alongside these observations, and focusing on research question 3, I identify specific explanations for different levels of stakeholder engagement. Not only does the absence of resources and supporting structures explain uneven patterns of engagement, but we might also turn to the legacy of past policies and the turmoil of policy churn, as well as the composition of particular groups of stakeholders. For example, the exclusion of workers/trade unions can be attributed, in part, to a legacy of policy decisions made by the UK Government over the past 40 years. The dismantling of tripartite arrangements in the 1980s and 1990s by a Thatcher Conservative government committed to neoliberal policies led to the marginalisation of trade unions in political life, and the foregrounding of employer perspectives (Keep et al. 2010; Stuart and Huzzard 2017; Stuart 2019). This largely remains the case, including in Wales. Therefore, as this study evidences, despite a rhetoric of collaboration and (social) partnership from the Welsh Government since devolution

(Welsh Government 2023b; 2024a), the legacy of neoliberalism continues to inform and shape the discourse and practice of education policy making in Wales.

The Welsh Government's Social Partnership and Public Procurement Act (Welsh Government 2023b) indicates a political intent to introduce some type of social partnership model in Wales. However, as has been noted in this thesis, the institutional and regulatory frameworks necessary for a wider array of stakeholders to participate in VET system arrangements – that are in place in other countries with 'collective skill formation systems' (and it might be argued were at one time more evident in the UK) – are not currently in place in Wales. Instead, the VET system (and the actors within it) remains quite fragmented. For example, employers' interests are mainly represented by Regional Skills Partnerships, sector bodies (including the remains of Sector Skills Councils) and employer associations such as the CBI and the Federation of Small Businesses, but they do not resemble the strong institutions that represent the interests of employers in other countries.

Certainly, as this thesis has confirmed, there are no employer associations in Wales that are comparable to, for example, the Chamber of Commerce and Industry in Germany or the Chamber of Commerce in Austria (see Payne 2008; Emmenegger et al. 2019). Nor is there strong trade union representation in Wales, such as in place in Germany, Austria and Denmark or an institutionalised set of rights for involvement (see Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020). The outcome reflected in this study is uneven levels of participation that serve the needs and interests of some stakeholders better than others. What this thesis evidences is that sector body involvement (often in the form of government funded bodies) is prioritised as is employer engagement. Yet, the commitment of employers to participate in reform efforts is weak (Huddleston et al. 2005; Huddleston 2020; Relly and Laczik 2022), and within current arrangements (in the UK more broadly and Wales specifically) space is rarely given to the voices of others in meaningful ways.

Further explanations for a lack of inclusion involve the legacies of policy churn and institutional change that present obstacles to coordinated and coherent reform. The VQ reforms, and the unevenness of the stakeholder engagement within them, were shaped in particular ways. This thesis argues that the 'newness' of Qualifications Wales, and its lack of organisational memory and related policy memory, as well as its limited experience of collaborating with stakeholders in the VET system, were key reasons for why Qualifications Wales had not put in place the necessary groups/networks and mechanisms to involve and balance different interests (and voices) in the reform process. Indeed, I argue that frequent changes to the organisations responsible for the reform of VQs in Wales since education was devolved to the Welsh Government - for example, Qualifications Wales is the third qualifications regulator in Wales since 2001 - has created a level of instability and a weak basis for facilitating changes to VQs. In contrast, we might point to the relative stability of VET systems elsewhere, for example, Norway and Germany (see Chapter 7 Section 7.4). This is not the case in Wales where frequent institutional change has not provided the necessary stability for qualifications regulators (and other public institutions responsible for different elements of the VET system) to effectively collaborate with stakeholders in the process of reforming VQs.

Finally, the composition of some groups perhaps makes them more difficult to reach, but this is compounded by the absence of any structured means to engage them. For example, the disparate nature of learners, and the absence of formal networks/groups and mechanisms to represent their interests, contributed to their exclusion from VQ reforms – as evidenced by this study – despite claims they are at the heart of the education and qualifications system in Wales (Welsh Government 2010; 2022a; Qualifications Wales 2023b; Medr 2024).

## 8.3. Key contributions of the study

This thesis makes a contribution in a number of important ways. Firstly, this is the first study that has explored the involvement of stakeholders in VQ reforms at a national level in Wales since devolution. It is novel in that it addresses an aspect of educational research that has not been given the attention it deserves. Most of the literature on the UK that has explored stakeholder involvement in VQ reforms has primarily focussed on the role of employers in England (for example, Huddleston and Laczik 2012; 2018; Haynes et al. 2013). This study extends the investigation to include a wide range of stakeholders with an interest in the reform of VQs, some of which (for example, sector trade unions) have been overlooked in previous UK research focussed specifically on processes of VQ reform. Examining the breadth of stakeholders, beyond a narrow focus on one type of actor, revealed the complex patterns of involvement and influence, including how different interests and voices contribute, collaborate and conflict in the reform process. This offers a wider contribution that extends beyond the geographical boundaries of Wales and contributes to existing knowledge on patterns of stakeholder inclusion/exclusion and influence in VQ reforms.

Secondly, the focus on Wales, and the first programmes of substantive VQ reform since devolution, contributes to the extant literature by examining how VQ policy and reform is informed by stakeholders in a devolved country. It offers an insight into the extent to which ambitions for a social democratic approach in Wales, and supposedly strong notions of collaboration and partnership between stakeholders (James 2011; 2019; Rees 2011; Power 2016; Power and Taylor 2022), have strengthened the development of VET policy. As such, this thesis contributes to an understanding of how, and to what extent, a devolved country attempts to diverge from policies they have previously been subject to for decades. In this particular case, the UK Government's shaping of education policy, and the divergence the Welsh Government seeks from England and its neoliberal approach. For example, I draw attention to the exclusion of trade unions in VQ reforms in Wales and claim that the legacy of neoliberalism continues to inform

and shape the discourse and practice of education policy making in Wales, despite ambitions of social partnership from the Welsh Government. Further, such discussions contribute to the evidence for understanding the processes by which other devolved nations, such as Northern Ireland might transition their education system. Currently, Northern Ireland, like Wales, is exploring the options to move away from dependence on the three-country model of qualifications regulation that is dominated by England, by developing their own VQs (Northern Ireland Department for the Economy 2023).

Thirdly, another significant contribution is the novel exploration of VQ reforms in two contrasting employment sectors, which begins to extend understandings of sectoral VQ reform more generally. Previous studies have, for example, tended to focus on specific VQ reforms (for example, NVQs or 14-19 Diplomas) rather than providing a comparison between reforms in different sectors. There has also been a tendency to assume that actors behave and participate in consistent ways across sectors, and, as such, a one size approach to VQ reform is best – as seen with the development of 14-19 Diplomas and T Levels in England (see, for example, Ertl and Stasz 2010; Misselke 2022). However, this study shines a light on sectoral differences and how different actors, with competing interests, shape and influence VQ reforms across sectors.

As this research makes plain, not all actors across different sectors behave in the same way and have the same interests and priorities. The importance of a sectoral comparison is illustrated by the differences between the two sectors in this thesis. For example, HSCC has two very prominent sector bodies whilst CBE has one influential sector body and many other bodies who have an interest in the reform process but far less sway over developments. On one level, such comparisons have significant value and add to the wider knowledge about the role of diverse actors, many of which are Wales-only stakeholders whilst others operate pan-UK (such as employers and sector bodies), and how they shape VET/VQ policy across employment sectors. On another level they add up to a contribution concerned with the value of sectoral approaches to VQ reform, such as that taken in Wales.

Fourth, this study identified specific enablers and constraints to stakeholder involvement and influence that are applicable beyond Wales. Commentators, for example Finlay (1998), draw our attention to the impact that enablers such as wealth, resources and access can have on the ability of stakeholders to influence the development of VET policy. This study builds on these observations by including the role of representative networks and groups which are further enablers to stakeholder influence – particularly at the sectoral level. For example, the BACH Network in the CBE sector and ColegauCymru's C&Q Group are identified as influential mechanisms that held sway in the reform process. The extant literature (for example, Lindell 2004; Busemeyer and Trampusch 2012) mostly explores the role of traditional interest groups in these processes, such as employers' associations and trade unions in VET systems. This study extends the existing literature by offering an exploration of the role of sectoral networks/groups and the influence they can exert on enabling the reform process.

Finally, although organisational memory has been widely researched, particularly in a business management context (for example, Balmer and Burghausen 2015; Langenmayr 2016; Foroughi et al. 2020), understandings of the implications of organisational memory on the public institutions responsible for education, specifically VQs and/or VET in this case, are underexplored. This study applies the concept of organisational memory to an educational context and shows its usefulness in explaining why Qualifications Wales' 'newness' and lack of experience constrained the reform process and influenced the decisions made. This suggests that extant research on policy memory and policy learning in education (for example, Higham and Yeoman 2007; Raffe and Spours 2007a; 2007b; Hodgson and Spours 2016; Laczik et al. 2023) could be enhanced by integrating the concept of organisational memory. Further, this study adds to existing knowledge on policy churn and its impact on education/qualification reforms. Although others (for example, Keep 2015a; 2015b; Hanley and Orr 2019; Misselke 2022) make observations on the extent of policy churn in the English VET system, I apply the concept specifically to the process of reforming

VQs and provide examples of shortcomings (such as the absence of mechanisms to involve a wide array of voices in VQ reforms) that are attributed, in part, to frequent policy and institutional churn.

## 8.4. Recommendations for policy and practice

This section outlines three recommendations for policy and practice. The first two are directed at Qualifications Wales and the third at the Welsh Government.

## 1. Establish mechanisms to involve stakeholders, in more inclusive ways, in the process of reforming VQs in Wales.

This recommendation does not put forward a naïve plea for 'all stakeholders to be involved equally' in VQ reforms, in any crude sense, given that, as evidenced by this study, the mechanisms and frameworks are not in place in Wales to facilitate such an approach and to do so would be to ignore the factors that impact levels of involvement and influence. As such, it is likely there will always be an imbalance in levels of stakeholder involvement and influence. Acknowledging these limitations, this thesis calls for the establishment of mechanisms to involve a range of stakeholder interests and voices, in more inclusive ways, in the process of reforming VQs in Wales than is currently the case.

Whilst mechanisms cannot ensure full equality of voice for all stakeholders, and indeed this might not be fully desirable (learners, for example, are unlikely to completely comprehend the skills and learning needs of any given occupation), they should be informed by aspects of equity and inclusion. Mechanisms should aim to be inclusive of the wide array of stakeholder voices and also seek equity across the balance of perspectives. For example, with regard to employers as a category of stakeholder, mechanisms might aim to balance in fairer ways the often-overwhelming influence of larger employers, with all the resources they might bring to bear in such reviews, with those of SMEs whose capacities are far less but who comprise the majority of employers. Mechanisms might also aim to include the voice of workers, through the inclusion of trade unions, alongside employers, with the aim of providing greater input and equity between the interests and voices of labour and capital.

One approach to involve stakeholders in more equitable ways would be to establish an external stakeholder board, learning from examples such as the VET Councils in Denmark and the Board of the Federal Institute for VET in Germany (see Emmenegger and Seitzl 2020). These bring together stakeholders on a more inclusive basis in the process of reforming VQs. The proposed board would comprise representation from employers, trade unions, learning providers, sector bodies, government representatives and learners, and could be a governance stage that feeds into Qualifications Wales' governance processes and ultimately the Qualifications Wales Board.

## 2. Put in place processes and arrangements to effectively document, store and retain information and experiences to aid the development and retention of organisational memory and policy memory.

As Qualifications Wales matures and undertakes further VQ reforms it is important that the organisation puts in place arrangements to support the development of organisational memory and policy memory. This should include processes and arrangements to effectively document, retain and share previous experiences to learn from past successes and failures, and to avoid repeating the mistakes of the past. Raffe and Spours (2007a) suggest that building memory comes from a wide range of resources and contexts such as past experiences and studying how other organisations and countries approach VQ reforms. For example, Alvarado et al. (2005) claim that there are several steps that could be taken including implementing robust knowledge management systems, establishing effective coaching and mentoring systems so that experienced staff can share their knowledge and skills with newer staff members, and conducting lessons learnt activities following reforms to serve as a reference for future work.

## 3. Give more longevity to Welsh Government sponsored bodies, such as Qualifications Wales, that are responsible for the reform of VQs in Wales.

Raffe and Spours (2007a), when discussing the development of policy memory, claim that to develop memory takes time and requires a level of institutional stability. Indeed, as evidenced by this thesis, the instability of national qualifications regulators in Wales was a significant obstacle to coordinated and cohesive reform. Higham and Yeomans (2007) make a similar claim by arguing that policy memory is unlikely to accumulate in organisations which are frequently restructured or where staff regularly change. As such, it is recommended that Welsh Government sponsored bodies responsible for the reform of VQs, such as Qualifications Wales, have a level of stability in order to develop a culture of policy learning, to accumulate historical knowledge, and to see through the implications of policies and reforms. Qualifications Wales has now been in place for nine years but history shows that Welsh Government sponsored bodies have relatively short lifespans (for example, Qualifications Wales is the third qualifications regulator since 2001). Therefore, if Qualifications Wales is to continually learn and improve its approach to VQ reforms, then time and stability are necessary components to build organisational and policy memory.

## 8.5. Limitations and areas for further research

Whilst this thesis has made contributions to our understanding of stakeholder involvement and influence in VQ reforms, as well as offering recommendations for policy and practice, it is important to acknowledge the study's limitations. Four potential limitations are offered in this section. Firstly, it should be noted that the findings of this thesis are based on data from Wales. Although many of the findings may have broader relevance and applicability to reforms in other countries, it is important to acknowledge that some elements may be specific to Wales and may carry less significance when generalised to other countries. For example, the discussion on bodies such as SCW and HEIW are unique to Wales and, although government funded bodies exist in other countries, the remit of such bodies may differ. The study thus represents an empirical and novel contribution in its focus on Wales, but in doing so carries particular limitations.

Secondly, the findings of this thesis are limited to two VQ reforms undertaken by Qualifications Wales. Although some of the findings may have relevance to other more recent reforms, such as those in the Hospitality and Catering and Travel and Tourism sectors, it is important to acknowledge that others, in particular the actors influencing the process, may be less relevant. Further research would be needed to identify whether the findings identified in this thesis also apply to VQ reforms in other sectors in Wales. Thirdly, the research sample did not include representatives from all stakeholder groups with a potential interest in the reform of VQs in Wales. For example, learners were not interviewed for this study and this was arguably a missed opportunity, particularly given what is argued in previous sections.

Finally, there are methodological limitations which are discussed in Chapter 4. The familiarity and positionality of the researcher – as a senior manager at Qualifications Wales – must be acknowledged as both an enabler and a limitation. Although this offered a number of benefits, such as improved access to information relevant to the research and to participants, it nevertheless had implications for the knowledge generated and framing of the study. Strategies were put in place to mitigate the impact of being an 'insider' and to 'fight familiarity' (Delamont and Atkinson 1995) but this remained a limitation.

Whilst acknowledging these limitations, this study has identified three areas for further research. First, research focussed on other, more recent, VQ reforms undertaken by Qualifications Wales, such as in the Hospitality and Catering and Travel and Tourism sectors, might add a different perspective. These sectors are very different to HSCC and CBE. They are smaller and do not have strong sector bodies such as SCW, HEIW and the CITB. As such, important lessons could be learnt about the extent of

stakeholder involvement and influence and whether there are further issues raised given their particular context.

Second, there are findings from this study which could be researched in greater detail to better understand how they impact the process of reforming VQs. Research to explore learners' interests, views and perspectives could provide valuable insights. Moreover, given the importance of social partnership in countries with reportedly strong VET systems (see Emmenegger and Seitzl 2020) and the introduction of the Social Partnership and Public Procurement Act in Wales (Welsh Government 2023b), research focussed on the extent of social partnership in the VET system and how it could operate in the process of reforming VQs in Wales may enhance knowledge in the field.

Finally, international comparison studies could be undertaken between Wales and other UK countries and internationally to examine how stakeholder involvement in VQ reforms compares. There is a significant comparative education literature, including on policy borrowing and learning, but few that focus on Wales (Lloyd and Payne 2012a is one useful exception). Hence, given the reported strengths of VET systems in countries with 'collective skill formation systems' (for example, Busemeyer and Trampusch 2012; Emmenegger and Seitzl 2020), a comparative study specifically focussed on Wales and one or more of those countries would help identify features that could be adopted in Wales. To some extent such questions are answered by this thesis (e.g. lack of institutional and regulatory frameworks, policy legacy) and the policy borrowing literature (see, for example, Turbin 2002; Nir 2019), but they remain pertinent and worthy of continued discussion. Indeed, ongoing comparisons with countries that have social democratic regimes, such as the Nordic countries of Denmark, Finland, Norway and Sweden (see Avis 2019; Persson Thungvist et al. 2019), to which Wales seemingly aspires, may help identify the incremental means by which wider and deeper stakeholder involvement might be achieved.

## 8.6. Conclusion

This thesis, which was undertaken during a significant period of VQ reform in Wales, has identified in what ways stakeholders were involved in VQ reforms and makes recommendations for strengthening the process in future. Although there has been some criticism of Qualifications Wales' management of these reforms, there appears to be more VQ reform on the horizon. Reforms are underway in the Travel and Tourism and Hospitality and Catering sectors and significant reforms are ongoing to develop new VQs for 14–16-year-olds to align with the new Curriculum for Wales. Moreover, in September 2023, the Review of VQs in Wales, commissioned by the Welsh Government, recommended that Qualifications Wales renews its approach to sector reviews, puts in place a 10-year plan for reviews and identifies VQs that should be reformed for Wales (Welsh Government 2023a). Therefore, the findings and recommendations of this study make a focused but significant contribution to policy and practice that should inform the work of Qualifications Wales as it embarks on the next round of VQ reforms in Wales as well as a broader contribution to the academic literature in the field.

## 8.6.1. Final reflections

This study was undertaken during the Covid-19 pandemic and it would be remiss not to discuss in some way the impact of the pandemic on the ways that stakeholders are now engaging in VQ reforms. Improvements in technology – driven largely by the needs of businesses and individuals during the pandemic – has meant that online meetings, interviews and events are now an efficient and low-cost way of engaging with stakeholders. In-person meetings and events are less common than they once were, but there are trade-offs to online engagement, particularly in terms of levels of contribution from stakeholders and, potentially, how they can influence developments (Poschmann 2022). Nevertheless, it appears that online stakeholder engagement is here to stay, and this presents an opportunity to utilise the digital tools available to

include a range of different interests and voices in the process of reforming VQs in Wales.

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# Appendices

### Appendix 1 – Ethics approval letter



School of Social Sciences Ysgol Gwyddorau Cymdeithasol Head of School, Pennaeth yr Ysgol Dr Tom Hall

24 May 2021

Our ref: SREC/4173 Gareth Downey Professional Doctorate Programme

SOCSI

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#### Dear Gareth,

Your project entitled 'The role and influence of stakeholders in the reform of vocational qualifications in Wales' has now been approved by the School of Social Sciences Research Ethics Committee of Cardiff University and you can now commence the project should all necessary forms of approval been received.

If you make any substantial changes with ethical implications to the project as it progresses you need to inform the SREC about the nature of these changes. Such changes could be: 1) changes in the type of participants recruited (e.g. inclusion of a group of potentially vulnerable participants), 2) changes to questionnaires, interview guides etc. (e.g. including new questions on sensitive issues), 3) changes to the way data are handled (e.g. sharing of non-anonymised data with other researchers).

In addition, if anything occurs in your project from which you think the SREC might usefully learn, then please do share this information with us.

All ongoing projects will be monitored and you will be obliged periodically to complete and return a SREC monitoring form.

Please inform the SREC when the project has ended.

Please use the SREC's project reference number above in any future correspondence.

Yours sincerely

Dr Kirsty Hudson Chair of School of Social Sciences Research Ethics Committee

cc: Dean Stroud, Caroline Lloyd



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Registered Charity, no. 1136855 Elusen Gofrestredig, rhif 1136855 Good afternoon [insert name]

I hope you're well.

As part of a Professional Doctorate in Education programme at Cardiff University I am undertaking a study exploring the *role and influence of stakeholders in the reform of vocational qualifications in Wales*. The research will focus on the reform of health and social care and childcare and construction and the built environment qualifications with the aim of identifying how stakeholders were involved in, and influenced, the reform process and to identify how stakeholders can be better involved in future reforms.

Given your involvement in the reforms, you would be able to positively contribute to the research project. The research would be an opportunity for you to share your views and experiences of being involved in the recent reform programmes.

The only commitment from you would be to participate in an online interview, at a time to suit you, which should take approximately 45-60 minutes.

Would you be willing to participate in the research?

I look forward to your reply.

Kind regards

Gareth

### The role and influence of stakeholders in the reform of vocational qualifications

### About this research

This research project will explore the role and influence of stakeholders in the reform of vocational qualifications in Wales. This research will explore what role stakeholders had during the sector review process and how they influenced the decisions leading to the development of new vocational qualifications in Wales, how stakeholders are involved in the design and development of approval criteria for reformed vocational qualifications and how stakeholders could be better engaged in future VQ reforms. The research is focussed on the reform of vocational qualifications in the health and social care and childcare and construction and the built environment sectors.

This research will attempt to identify ways in which stakeholders can be better involved in future reforms of vocational qualifications. The findings of this research will be used in a published thesis for a Professional Doctorate in Education being undertaken by the Researcher.

#### **Stakeholder interviews**

The research will include online semi structured interviews with stakeholders who have been involved in the reform of health and social care and construction and the built environment qualifications. It will also include interviews with stakeholders who have not been involved but who are key stakeholders in the vocational education and training system in Wales. These stakeholders will include employers, learning providers, awarding bodies, sector bodies and trade unions across Wales.

Interviews will be conducted online (using Microsoft Teams) at a time to suit you and should last for around 45-60 minutes.

#### About the Researcher

Gareth Downey is Senior Qualifications Manager at Qualifications Wales. He works in the Qualifications Policy and Reform directorate and has responsibility for range of policy and reform related work. He is undertaking a Professional Doctorate in Education course at Cardiff University and the research findings will be used in a published thesis as part of this course and may be used for other reports or publications.

#### **Privacy/Confidentiality**

Interviews will be audio recorded and transcribed to ensure that the discussion is accurately captured during the analysis and reporting phase. All responses will be anonymised upon transcription, and access will be restricted to the researcher and those directly involved in the

research. Steps will be taken to ensure that individuals cannot be identifiable in any final report or output. If you do not want your interview to be recorded, please inform the researcher.

#### Right to withdraw from the research

Your participation in this research is voluntary and you have the right to refuse to answer any interview questions and/or withdraw permission to use the data from your interview within 4 weeks after the date of your interview. If you would like to withdraw, please inform the researcher who will discard any information you have already provided.

#### **Data protection**

Personal data collected from you including signed consent forms, original audio recordings and a transcript of your interview will be retained in a secure online repository, only accessible by the researcher and by supervisors and examiners if required. Personal identifying data will be kept securely for a period of 24 months following the publication of the research report and then will be deleted. You are entitled to access the information you have provided at any time while it is in storage.

If you have any questions about this research, please contact gareth.downey@qualificationswales.org.

Thank you in advance for taking the time to participate in this research. I really do appreciate your time to support my studies.

#### Consent form for participation in research activities

Please read the statements below. If you consent to participate, please sign the declaration at the bottom of the page.

- 1. I have read and understood the information sheet for the research titled '*The role and influence of stakeholders in the reform of vocational qualifications in Wales*' or it has been read to me. I have been able to ask questions about the research and my questions have been answered to my satisfaction.
- 2. I have had explained to me the purposes of the research and what will be required of me. I understand that participation is entirely voluntary, that I can refuse to answer any questions, and that I have the right to withdraw permission to use the data from my interview within 4 weeks after the date of my interview, and that this will be without detriment.
- 3. I understand that taking part in this study involves participating in an interview with the researcher, Gareth Downey. I understand that the interview will be audio recorded and transcribed as text, but I will not be identifiable in any final report or output. I understand that disguised extracts from my interview may be quoted in any published document.
- 4. I understand that personal data collected from me including signed consent forms, original audio recordings and a transcript of my interview will be retained in a secure online repository, only accessible by the researcher and those directly involved in the research. I understand that any personal identifying data will be kept securely for a period of 24 months following the publication of the research report and then will be deleted. I understand that under freedom of information legalisation, I am entitled to access the information I have provided at any time while it is in storage.
- 5. I have had explained to me what information will be collected about me, what it will be used for, who it may be shared with, how it will be kept safe, and my rights in relation to my data. I understand that I have the right to request the withdrawal of my personal information by emailing <u>Gareth.downey@qualificationswales.org</u>.

Name:	
Signed:	Date:

### **Appendix 5 – Interview schedule – Qualifications Wales staff**

#### The role and influence of stakeholders in the reform of vocational qualifications Interview schedule (Qualifications Wales staff)

This document is for use during each interview. It sets out the ground to be covered and gives an indication of the kinds of questions and probes that might be used to elicit key information but is not prescriptive.

#### Lead up to interview

#### **General introduction**

Introduce yourself. Thank the participant(s) for agreeing to take part.

#### **Reason for interview**

As you might already be aware, the aim of this research is to explore the role and influence of stakeholders in the reform of vocational qualifications in Wales with a focus on the reform of health and social care and construction and the built environment qualifications. It also aims to identify ways in which stakeholders can be better involved in the reform of vocational qualifications in Wales.

I sent you an information sheet that described the research in detail. Have you had a chance to read it?

[If not, give a brief introduction about the research and the participants rights in respect to withdrawing etc]

[If yes (or after giving the brief introduction)]:

Do you have any questions about the research? Would you like to know anything else about the research?

#### Time/Confidentiality/Recording

This meeting will explore your views, opinions and experiences and should not take more than 60 minutes. Is this OK with you [if this is not, adjust your questioning later on]?

Explain what the participant should do if they encounter technical difficulties during the interview.

Are you happy if I record our discussion? This is just to save me taking notes and so that I can concentrate on what you say.

The recording will be stored securely, and your personal information will be kept confidential. Your name will not be linked to your views in any reports or presentations of the findings. I will take steps to ensure that you cannot be identified and as a result your views or comments will be presented anonymously. [If participant does not agree, ask permission to make detailed notes as you go along].

Are you happy to sign and return the consent form to confirm you are happy to participate?

#### Start audio recorder (if participant agrees to it)

Thanks again for allowing me to record our conversation. As I already explained, I will take steps to ensure that you cannot be identified. I previously sent you information about your rights, but at this point I would like to emphasise again that as your participation is voluntary you do not have to answer all of my questions and you can stop our conversation at any point. Although we have already discussed the purpose of the research, please feel free to ask me any questions that you might have about it as we go along.

Do you have any questions/concerns before we start? [Check that the participant is happy to continue].

#### Role/background of individual/organisation

- 1. Please tell me about your role in Qualifications Wales and your role in the reform of vocational qualifications in the health and social care and/or construction and the built environment sectors?
- 2. Please tell me about the reasons for reforming qualifications in the health and social care and/or construction and the built environment sectors?

Probes:

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- Why was the decision made to reform vocational qualifications in these sectors?
- Was the decision driven forward by internal or external stakeholders?
- Why were these sectors prioritised?
- What did Qualifications Wales set out to achieve with these reforms?

## 3. Thematic area 1 – The role of stakeholders in the sector reviews leading to the development of vocational qualifications

• [May need to separate the questions and information by health and social care and construction and the built environment reforms]

- Please tell me how stakeholders were involved in the sector review leading to the development of vocational qualifications in the health and social care and construction and the built environment sectors?
  - Which stakeholders influenced the sector reviews? Why these stakeholders? How were these stakeholders identified? Were any stakeholders excluded from influencing the sector review process? Why?
  - How were stakeholders involved in the sector reviews of health and social care and/or construction and the built environment? Did the approaches differ between the two sector reviews?
  - Were the reform proposals tested with stakeholders? If so, how were they tested? And with which stakeholders?
  - How were stakeholders involved in the consultation prior to the publication of the sector review outcomes?
- Please can you tell me about any different or competing views and perspectives between stakeholders. What were these competing views and perspectives? How far did they exist and what were the key differences? Ask for examples.
- In what ways were the competing views and opinions of particular stakeholders managed when making policy decisions leading to the development of approval criteria for new health and social care and/or construction and the built environment qualifications?
- What worked well when stakeholders were involved in shaping and influencing the outcomes of the sector reviews?
- What challenges were faced when stakeholders were involved in shaping and influencing the reform proposals during the sector review of health and social care and/or construction and the built environment qualifications? What would you change in future reforms when involving stakeholders in the sector review process?

# 4. Thematic area 2 – The role of stakeholders in the design and development of approval criteria for reformed vocational qualifications

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- Once the decision was made to reform qualifications in the health and social care and construction and the built environment sectors, how were stakeholders involved in the design and development of approval criteria?
  - Which stakeholders were involved in the design and development of approval criteria for the reformed qualifications? Why these stakeholders? Were the stakeholders involved representative of the sector?
  - Were any stakeholders excluded from the design and development of approval criteria? If so, which stakeholders? And why?
  - Which stakeholders were part of the stakeholder panels? Why these stakeholders? What influence did they have?
- Did the approaches taken to involving stakeholders differ between the reforms of health and social care and construction and the built environment qualifications? If so, how? Why did the approaches differ?

- Have you been involved in the reform of vocational qualifications in other sectors or jurisdictions? If so, how did the involvement of stakeholders differ between Wales and other jurisdictions?
- Please tell me about any different or competing views and perspectives that arose between different stakeholders during the design and development of approval criteria for reformed vocational qualifications? Why do you think these different views and perspectives existed?
- How were any competing views and interests between different stakeholders managed during the design and development of approval criteria?
- What worked well when involving stakeholders in the design and development of approval criteria for health and social care and/or construction and the built environment qualifications?
- What challenges were faced when involving stakeholders in the design and development of approval criteria? What would you change in future reforms when involving stakeholders in the design and development of health and social care and/or construction and the built environment qualifications?

# 5. Thematic area 3 – How stakeholders can be better involved in the reform of vocational qualifications in Wales

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- What have you learnt from the recent reform programmes about how you might better involve stakeholders in future reforms of vocational qualifications?
- How and in what ways could stakeholders be better involved in the reform of vocational qualifications in Wales?
- Are there any particular stakeholders that should have been better involved in the reform of vocational qualifications? If so, which stakeholders? Why these stakeholders? How could these stakeholders be better involved?
- Were there any particular stakeholders that should have been involved less or involved in different ways? If so, which stakeholders? Why these stakeholders? In what ways should these stakeholders have been involved?
- Are there any stakeholders who were not involved in the reform of vocational qualifications that you would aim to include in future reforms? If so, which stakeholders? Why these stakeholders? In what ways should these stakeholders have been involved?

### **Closing the interview**

- Looking forward 5 years, what improvements/differences would you expect to see with the reformed qualifications compared with the qualifications they have replaced?
- Is there anything else you would like to tell me about the role and influence of stakeholders in the reform of health and social care and construction and the built environment qualifications?
- Do you have any questions about this research?

• Are there any organisations and/or individuals that you would recommend we speak with during this research?

Give a summary of how useful the information will be and thank them for their time. Explain to the participant what the next steps will be for the research.

### The role and influence of stakeholders in the reform of vocational qualifications Interview schedule (Participants external to Qualifications Wales)

This document is for use during each interview. It sets out the ground to be covered and gives an indication of the kinds of questions and probes that might be used to elicit key information but is not prescriptive.

#### Lead up to interview

#### **General introduction**

Introduce yourself. Thank the participant(s) for agreeing to take part.

#### **Reason for interview**

As you might already be aware, the aim of this research is to explore the role and influence of stakeholders in the reform of vocational qualifications in Wales with a focus on the reform of health and social care and construction and the built environment qualifications. It aims to identify ways in which stakeholders can be better involved in the reform of vocational qualifications in Wales.

I sent you an information sheet that described the research in detail. Have you had a chance to read it?

[If not, give a brief introduction about the research and the participants rights in respect to withdrawing etc]

[If yes (or after giving the brief introduction)]:

Do you have any questions about the research? Would you like to know anything else about the research?

#### Time/Confidentiality/Recording

This meeting will explore your views, opinions and experiences and should not take more than 60 minutes. Is this OK with you [if this is not, adjust your questioning later on]?

Explain what the participant should do if they encounter technical difficulties during the interview.

Are you happy if I record our discussion? This is just to save me taking notes and so that I can concentrate on what you say.

The recording will be stored securely, and your personal information will be kept confidential. Your name will not be linked to your views in any reports or presentations of the findings. I will take steps to ensure that you cannot be identified and as a result your views or comments will be presented anonymously. [If participant does not agree, ask permission to make detailed notes as you go along].

Are you happy to sign and return the consent form to confirm you are happy to participate?

### Start audio recorder (if participant agrees to it)

Thanks again for allowing me to record our conversation. As I already explained, I will take steps to ensure that you and your organisation cannot be identified. I previously sent you information about your rights, but at this point I would like to emphasise again that as your participation is voluntary you do not have to answer all of my questions and you can stop our conversation at any point. Although we have already discussed the purpose of the research, please feel free to ask me any questions that you might have about it as we go along.

Do you have any questions/concerns before we start? [Check that the participant is happy to continue].

### Role/background of individual/organisation

- 1. Please tell me about your organisation, your role at your organisation and your involvement [if any] in the reform of vocational qualifications in health and social care and/or construction and the built environment?
  - What interest does your organisation have in the reform of vocational qualifications in Wales?

## 2. Thematic area 1 – Role of stakeholders in the sector review leading to the reform of vocational qualifications

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- Please tell me if/how you were involved in the sector reviews leading to the development of vocational qualifications in the health and social care and/or construction and the built environment sectors?
  - How were you involved in the sector reviews of health and social care and/or construction and the built environment? If you were involved, how were you involved? Why did you engage in these reviews?

- Were you consulted on the proposals for the reform of health and social care and/or construction and the built environment qualifications? If so, how were you consulted?
- If you were not involved in the sector reviews, why was that? In what ways would you expect to be involved? In what ways could you have contributed to the process?
- If you were involved in the sector reviews, please tell me about any different views and perspectives that arose between stakeholders? Why do you think these views and perspectives existed?
- What worked well when you were involved in the sector reviews?
- What challenges did you face when being involved in the sector reviews? Why was that?
- What could have been improved about the ways in which you were involved in the health and social care and/or construction and the built environment sector reviews?

# 3. Thematic area 2 – Role of stakeholders in the design and development of approval criteria for reformed vocational qualifications

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- Once the decision was made to develop new qualifications in the health and social care and construction and the built environment sectors, how were you involved in the design and development of approval criteria for new health and social care and construction and the built environment qualifications? Why did you participate?
  - Were you part of the stakeholder panels? If so, what was your experience of being involved in the stakeholder panels?
- If you were not involved, why not? What role would you expect to have in the design and development of approval criteria for new vocational qualifications? What could you have contributed to the process?
- If you were involved in the design and development of both health and social care and construction and the built environment qualifications, did your experiences of being involved in the process differ between the two reform programmes? If so, how? And why?
- Please tell me about any different views and perspectives that arose between different stakeholders during the design and development of approval criteria for new vocational qualifications.
  - Why do you think these different views and perspectives arose?
  - How did any competing views and perspectives impact on the design and development process?
  - How were any competing views and interests between different stakeholders addressed?
- What worked well when involving stakeholders in the design and development of approval criteria for new health and social care and/or construction and the built environment qualifications? Why?
- What challenges did you face when being involved in the design and development of approval criteria for new health and social care and/or construction and the built

environment qualifications? Why did you face these challenges? Were they resolved? If so, how were they resolved?

• What could be changed in future reforms when involving stakeholders in the design and development of approval criteria?

# 4. Thematic area 3 – How stakeholders can be better involved in the reform of vocational qualifications in Wales

- [May need to separate the questions and information by health and social care and construction and the built environment reforms]
- How and in what ways could stakeholders be better involved in the reform of vocational qualifications in Wales?
- Are there any particular stakeholders that you think should be better involved in the reform of vocational qualifications? If so, which stakeholders? Why these stakeholders? How could these stakeholders be better involved?
- Are there any particular stakeholders that should have been involved less or involved in different ways during the design and development of the reformed vocational qualifications? If so, which stakeholders? Why these stakeholders?

#### **Closing the interview**

- Looking forward 5 years, what improvements/differences would you expect to see with the reformed qualifications compared with the qualifications they have replaced?
- Is there anything else you would like to tell me about the role and influence of stakeholders in the reform of health and social care and/or construction and the built environment qualifications?
- Do you have any questions about this research?
- Are there any organisations and/or individuals that you would recommend we speak with during this research?

Give a summary of how useful the information will be and thank them for their time. Explain to the participant what the next steps will be for the research.