



**Integrated Impact
Assessment:**

**National 14–16 Qualifications in
Built Environment, Engineering
and Health & Social Care, and
Childcare Consultation**



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1. Introduction

- 1.1 We are consulting on our proposals on whether level 1 / 2 qualifications in built environment, engineering and health and social care, and childcare, should be designed as VCSEs or GCSEs. As part of the consultation, we are publishing an integrated impact assessment (IIA).
- 1.2 We already have an updated integrated [impact assessment](#) for the Full 14-16 Qualifications Offer. We committed to completing further work to help inform our decisions on these three subjects. The focus of this impact assessment is exclusively on these subjects.
- 1.3 We have also considered how our decisions might help reduce the inequalities associated with [socio-economic disadvantage](#), as well as contributing to the wellbeing goals and ways of working of the [Well-being of Future Generations Act](#), as outlined in our [wellbeing objectives](#).
- 1.4 It is important that our proposals realise the positive impacts we want to see in offering qualifications within these subject areas for learners aged 14 to 16 in Wales. We also want to minimise and mitigate any potential negative impacts as much as possible.
- 1.5 Our assessment describes the potential cost and delivery impacts of our proposals on different groups of stakeholders, including learners, centres and awarding bodies. We encourage our stakeholders to engage and provide feedback by responding to our [consultation](#). We will use feedback from this consultation to continue updating our impact assessment. This will inform our final decisions on whether these subjects will be available as VCSEs or GCSEs within the [National Qualifications from 2027](#).

Methods and sources

- 1.6 We have used a variety of sources of information and evidence to help inform this impact assessment. These include:
 - discussions with awarding bodies including the awarding body that will offer the Made-for-Wales GCSE and those interested in offering VCSE qualifications
 - discussions with centres that currently offer the GCSEs in built environment and health and social care, and childcare
 - discussions with colleges and training providers

- entry data for qualifications in these subject areas for 14-16 learners

2. Regulatory impact assessment

- 2.1 As a public body we are required to assess the likely impact, both positive and negative, of regulatory decisions we take.
- 2.2 As part of this assessment, we must consider a range of options, including an assessment of not taking any regulatory action (“do nothing”).
- 2.3 The following options are considered as part of this impact assessment:
Option 1: Do nothing (i.e. keep all three subjects as GCSEs)
Option 2: Require each subject to be a VCSE only
Option 3: Develop requirements for both VCSEs and GCSEs in each subject
Option 4: Consider each subject separately
- 2.4 This assessment provides an overview of the positive impacts identified to date; identifies potential negative impacts of each option and suggests how these impacts could be managed or mitigated effectively. It describes the potential cost and delivery impacts on different groups of stakeholders, including learners, centres and awarding bodies. It also sets out our view of the potential regulatory impacts of our proposals in the [consultation](#).
- Option 1: Do nothing**
- 2.5 This option maintains the original timetable, to make new qualifications in these subjects available for first teaching in September 2026. This option would provide the new qualifications earlier than some of the other options.
- 2.6 The option of doing nothing would mean that the qualifications in built environment, engineering and health and social care, and childcare would remain as GCSE qualifications.
- 2.7 There are advantages and disadvantages of this approach - these are outlined below.
- Advantages of Option 1**
- 2.8 This option maintains the original timeline of having new qualifications in these subjects available for first teaching in September 2026. This option would deliver the new qualifications at an earlier date than some of the other options.

- 2.9 For WJEC, this option would mean they are the only awarding body able to offer these qualifications. It would give them greater certainty around the viability of the GCSE qualifications offer as a whole and a clearer idea around the likely take up of these qualifications in these three subject areas.
- 2.10 Having only one awarding body delivering the qualifications makes it more straightforward to set and maintain qualification standards.
- 2.11 This option is consistent with previous messaging and communication around these subjects and would enable the same approach to be taken for all three subjects, therefore making the communications and messaging around these qualifications simpler and clearer.
- 2.12 GCSEs are an established and understood brand, therefore keeping them as GCSEs enables them to benefit from GCSE brand recognition.
- 2.13 There would be an administrative saving for Qualifications Wales as there would not be a need to incorporate these subjects into the VCSE approval criteria.

Disadvantages of Option 1

- 2.14 Keeping each qualification as a GCSE would mean that the VCSEs would be missing key vocational subject areas, where significant numbers of learners progress to further education.
- 2.15 Retaining each qualification as a GCSE could, to some extent, limit how practical and applied the qualification content and assessment could be due to the constraints around GCSE design parameters.
- 2.16 Stakeholders may perceive these qualifications as fitting in more naturally with the VCSEs given they each relate to an occupational area.
- 2.17 The approval criteria for GCSEs are tightly prescribed which limits, to some degree, the extent to which awarding bodies can innovate.
- 2.18 Only one awarding body has indicated that they would offer the qualifications if they were GCSEs, which in turn would limit choice for centres, compared with the current offer.
- 2.19 Making a single decision about all three qualifications may not adequately reflect the specific considerations and nuances of each subject.
- 2.20 There would potentially be more of a disconnect in the foundation qualifications in these subjects when compared to the foundation qualifications in other occupational

areas, as the progression route from the foundation qualifications in these three subjects would be different.

Option 2: Require each subject to be a VCSE only

Advantages of Option 2

- 2.21 Given the qualifications all relate to occupational areas, stakeholders may perceive them to more logically fit within the VCSE suite, thereby providing greater coherence to the VCSE qualifications.
- 2.22 This option would enable a consistent approach to be taken for all three subjects and so would make the communications and messaging around these qualifications simpler.
- 2.23 Multiple awarding bodies could offer the qualifications therefore providing additional choice to centres and potentially more competition in the market.
- 2.24 The approval criteria for the qualifications would be less prescriptive, thereby giving awarding bodies more freedom to innovate.
- 2.25 Designing the qualifications as VCSEs may make the qualifications more appealing and engaging for particular groups of learners.
- 2.26 There would potentially be more coherence across the foundation qualifications relating to occupational areas, as all these foundation qualifications would have a common progression route.

Disadvantages of Option 2

- 2.27 Does not adequately consider the specific considerations and nuances of each subject.
- 2.28 Having multiple awarding bodies makes it potentially harder to set and maintain standards in the qualifications between different awarding bodies.
- 2.29 The qualifications would not be available for first teaching until September 2027, which is a year later than if they were GCSEs.
- 2.30 More communications and messaging would be needed with centres to explain the change.

- 2.31 The VCSE brand is less established than the GCSE and so some centres may perceive such a decision as rowing back on some of the benefits of offering these subjects as GCSEs.
- 2.32 More resources needed from Qualifications Wales to develop design requirements for these subjects as VCSEs as not all aspects of the GCSE design requirements would be carried over if these subjects were to become VCSEs.

Option 3: Develop requirements for both VCSEs and GCSEs in each subject

Advantages of Option 3

- 2.33 Would give centres more choice and enable them to better tailor the offer to the specific needs of their learners.
- 2.34 Each type of qualification could have a different emphasis and focus, thereby catering better to the interests of different types of learners.
- 2.35 Having two qualifications would strengthen transition routes to both academic and more vocational routes within these subjects post-16.

Disadvantages of Option 3

- 2.36 Given the small cohort sizes in Wales, it is unlikely that offering both GCSEs and VCSEs in these subjects will be viable or sustainable for awarding bodies in the long term.
- 2.37 It may be difficult to make a clear distinction between VCSE and GCSE qualifications in these subjects and there is a risk of significant duplication or overlap between the qualifications.
- 2.38 Taking the same action for all three subjects may not adequately take into account the specific considerations and nuances of each subject.

Option 4: Consider each subject separately

- 2.39 In this option each subject is considered individually, and the relative merits and drawbacks of the qualification being offered as a VCSE, or a GCSE are considered on a subject basis. Different approaches could be taken for different subjects.

Advantages of Option 4

- 2.40 For each subject it will be possible to consider specific nuances and acknowledge that the arguments are different. In particular, the different:
- entry patterns and popularity of the existing qualifications
 - content and the extent to which meaningful practical and applied learning can be undertaken in 14-16 settings
 - impacts, concerns and priorities of stakeholders

- 2.41 For each subject it would be possible to achieve many of the benefits of either Option 1 or Option 2.

Disadvantages of Option 4

- 2.42 Having different approaches in different subjects may be contentious and be more difficult to communicate and justify publicly. However, this can be mitigated if there is a clear evidence-based rationale for taking different approaches in different subjects.
- 2.43 Having different approaches for different subjects may mean that the qualifications are introduced at different times.

Preferred option

- 2.44 Based on an assessment of the options, we are of the view that Option 4 is the strongest option. Although Option 1 has more advantages associated with it, the strength of Option 4 is that it recognises that a one size fits all approach is unlikely to deliver the best qualification for all subjects, and that a more tailored approach is preferable.
- 2.45 Whilst Option 3 is attractive on some levels, the practical challenges of creating a sustainable and viable Made-for-Wales offer in these subjects, in both the GCSE and VCSE space, given the small cohort sizes in Wales, make this option unrealistic.
- 2.46 There are generic impacts which apply to all subjects around whether the qualification in that subject is a VCSE or a GCSE which have been identified above under the options appraisal for Option 1 and Option 2. Below we outline the specific impacts relating to each subject around whether the qualification is a GCSE or a VCSE.

3. Subject-specific impacts

Built environment

Continue with the development of a GCSE Built Environment

- 3.1 We have identified the following specific impacts if we were to retain a GCSE Built Environment.

Impacts on learners

- 3.2 Learners would no longer have the option of taking a less academic and more practically focussed level 1/2 construction qualification. Some of these learners, who would otherwise take alternative level 1/2 qualifications, may perceive the GCSE to be less accessible and/or engaging. It is also important to note that some of these alternative qualifications currently have much higher entries than the GCSE, for example the WJEC level 1/2 qualification had over 1400 entries in 2022/2023 compared to fewer than 100 entries for the GCSE.
- 3.3 There is a technical design pathway within the GCSE which is not available in current vocational qualifications in built environment qualifications. Retaining the qualification as a GCSE will help to secure this route for future learners. There is a risk that the VCSE would be developed without the technical design pathway. However, it would be possible to mitigate this risk by requiring such a pathway to be included within a VCSE.

Impacts on centres

- 3.4 Centres who currently offer the GCSE could continue to do so, thereby reducing disruption in terms of having to transition to a new type of qualification. However, centres who offer alternative qualifications in this area at level 1/2 may feel that having to switch to a GCSE may impact upon their ability to meet the needs of particular groups of learners within their school.

Impacts on awarding bodies

- 3.5 If the qualification were to be retained as a GCSE, this would have a positive impact on WJEC as they would retain their status as the only supplier of the qualification. However, it may have a negative impact on other awarding bodies including those who are currently able to offer other designated qualifications in this subject area but will no longer be able to do so. This could result in them losing exam fee income from Wales.

Impacts on others

- 3.6 A number of industry bodies and employers contributed time and expertise to the development of the GCSE qualification and resources to support it. A positive impact of retaining the qualification as a GCSE is that the qualification will continue to benefit from this earlier input. Retaining the qualification as a GCSE is also more likely to potentially make these organisations more predisposed to helping support the revised qualification in the subject.
- 3.7 Should the retention of the GCSE result in fewer learners taking a qualification in built environment, this may impact progression and transition from 14-16 education to post-16 courses, and qualifications in built environment delivered by further education colleges.

Have a VCSE Built Environment

Impacts on learners

- 3.8 Learners who would like to take the GCSE qualification in built environment will no longer have the option to do so. As a VCSE qualification there may not be an option to study a technical design pathway which is an option within the GCSE. However, given the limited take up of the GCSE (93 entries in the 2022/2023 academic year) the number of learners impacted is likely to be small.
- 3.9 The VCSE qualification would potentially be more engaging and accessible for many learners, with more flexibility in the content and assessment.

Impacts on centres

- 3.10 For centres who have invested time and resources into preparing for and delivering the GCSE, this will have a negative impact as they will be required to change to a different type of qualification.
- 3.11 For centres who currently chose to use alternatives to the GCSE this approach is likely to be positive and more closely aligned with the qualifications they are currently offering.

Impacts on awarding bodies

- 3.12 If the qualification becomes a VCSE, this would have a negative impact on WJEC as the GCSE design requirements which they have invested time and resources in helping to co-create would not lead to a qualification. WJEC have dedicated staff such as a subject officer who has responsibility for this GCSE. From an exam fee income perspective, given the modest entry numbers for the GCSE the loss of exam fee income would be relatively small.
- 3.13 For other awarding bodies there would be a positive impact of having the qualification as a VCSE as it would enable them to develop VCSE qualifications in this

subject. This may be of particular benefit to awarding bodies who already offer alternative qualifications to the GCSE in this space.

Impacts on others

- 3.14 Having a coherent set of VCSE qualifications in this subject with a common set of requirements should help FE colleges in relation to progression and admission, as the qualifications in built environment that learners entering college have should have greater consistency and coherence.

Engineering

Continue with the development of a GCSE Engineering

- 3.15 We have identified the following specific impacts if we were to continue with the decision to create a GCSE Engineering

Impacts on learners

- 3.16 Our review of qualifications in engineering and manufacturing identified that more academically minded learners either do not choose the existing qualifications in engineering or are not offered them. This is partly because they do not have the status of a GCSE. Creating a GCSE in the subject may have a positive impact for some learners, particularly for those for whom the current qualifications in engineering are not considered appropriate.
- 3.17 Learners in other parts of the UK have the option of taking a GCSE engineering qualification (or in Scotland an equivalent national qualification) and so learners in Wales may be perceived as being disadvantaged if we were not to offer one.
- 3.18 If we were to create a GCSE in engineering the existing level 1/2 qualifications in engineering would no longer be made available. This may have a negative impact for some learners who may find the mathematical and scientific content in the GCSE either too demanding or not sufficiently engaging.

Impacts on centres

- 3.19 There is no GCSE in engineering currently and so the impact on centres is more neutral as, whichever approach we take, centres will be required to deliver a new qualification.
- 3.20 Introducing a GCSE would have a positive impact for some centres as they may be more inclined to offer an engineering qualification if it has the known status of a GCSE. However other centres may find that a GCSE does not suit the needs of their

learners and so may no longer offer engineering qualifications if the GCSE is the level 1/level 2 offer in this space.

Impacts on awarding bodies

- 3.21 If this qualification were to be a GCSE, then only WJEC would be able to offer it. This would have a negative impact on the other awarding bodies who currently offer 14-16 engineering qualifications in Wales and would benefit WJEC. However, it is important to note that in most cases the take-up of these qualifications is relatively small and the most popular one by a long margin is a WJEC qualification (the Level 1 / 2 Award in Engineering which had over 1500 entries in summer 2023).

Impacts on others

- 3.22 Having a GCSE in engineering could help raise the profile and status of the subject and therefore have a positive impact on the uptake of engineering related qualifications in post-16 settings such as colleges. Alternatively removing the other engineering qualifications could lead to reduced uptake pre-16 which may impact on progression routes to engineering courses in college.

Have a VCSE Engineering

Impact on learners

- 3.23 This would mean the qualification potentially has a more practical and applied focus which may make the qualification more accessible and engaging for some learners.
- 3.24 A VCSE may, initially, be less attractive to some learners as it is not yet an established and recognised brand like the GCSE.

Impact on centres

- 3.25 Some centres would welcome the more practical approach that the VCSE would provide, and its introduction would be a positive impact for centres in terms of meeting the needs of their learners.
- 3.26 Other centres may feel that without the status of a GCSE and with different content and assessment it may be less attractive for them to offer, or there may be less buy in from parents in the short term at least until the brand is established.
- 3.27 Centres would have an additional year to prepare for the new qualification if it were a VCSE which may be welcomed, particularly in the context of large-scale qualification reform across the suite.

Impacts on awarding bodies

- 3.28 As no engineering GCSE currently exists there is not the same impact for this qualification on WJEC as the other two subjects. That said, WJEC have committed significant time into the co-creation process for the GCSE. If the decision were taken

that engineering should be offered as a VCSE, this would impact their development timelines and staffing in a different way to other awarding bodies.

- 3.29 For other awarding bodies there would be a positive impact of having the qualification as a VCSE as it would enable them to develop VCSE qualifications in this subject. This may be of particular benefit to awarding bodies who already offer level 1/2 qualifications in this subject area.

Impacts on others

- 3.30 Having a VCSE in engineering may enable further education colleges to work more closely with awarding bodies and schools in the development and delivery of the qualification, leading to benefits for colleges in terms of collaborative working.
- 3.31 Some in the wider engineering community may perceive having a VCSE instead of a GCSE as in some way reducing the profile and status of engineering pre-16 education.

Health and social care, and childcare

Continue with the development of GCSE Health and Social Care, and Childcare

- 3.32 We have identified the following specific impacts if we were to retain health and social care, and childcare as a GCSE.

Impacts on learners

- 3.33 The existing qualification is well established (a GCSE has been offered in this subject for over 15 years) and is very popular with learners. In the 2022/2023 academic year over 4,500 learners took the single award GCSE. Retaining the subject as a GCSE qualification would mean learners in the future would continue to benefit from this.
- 3.34 The GCSE qualification provides a strong foundation for progression into the A level in health and social care, and childcare. Retaining a GCSE would have a positive impact for learners in terms of maintaining a clear progression route to the A level.

Impacts on centres

- 3.35 There are likely to be fewer workload implications for centres who deliver this qualification to high volumes of learners if this subject is retained as a GCSE.
- 3.36 Given the popularity of the current qualification retaining a GCSE would enable centres to meet the existing needs and expectations of learners who opt in high numbers to take this qualification.

Impacts on awarding bodies

- 3.37 For WJEC there would be a positive impact of retaining the qualification as a GCSE. Retaining the qualification as a GCSE would help to protect WJEC's exam fee income.

It would also help to protect the sustainability and viability of the Made-for-Wales GCSEs suite.

- 3.38 In relation to other awarding bodies there would be a negative impact of retaining the qualification as a GCSE as it would exclude them from a potentially high take up subject area.

Impact on others

- 3.39 Retaining the GCSE could have a positive impact on colleges as it provides them with a strong flow of potential learners for post-16 courses in health and social care, and childcare.
- 3.40 Retaining the GCSE may also have a positive impact on the sector, given the profile and status that a GCSE affords.

Create a VCSE Health and Social Care, and Childcare

Impacts on learners

- 3.41 Removing the subject as a GCSE may be perceived as a negative by some learners, particularly given how established it is as a GCSE subject and how popular the current qualification is.
- 3.42 Having a VCSE qualification in this subject area may create some unrealistic expectations for learners. This is because it is difficult to conduct practical and applied learning in this subject because of the logistical challenges for learners of this age in undertaking practical work in a care home or nursery setting. If the subject was a VCSE, some learners may be disappointed that practical and applied learning in this subject is more limited than for some of the other VCSEs.

Impacts on centres

- 3.43 If the subject were a VCSE then centres would have to manage learners' expectations around the practical work involved in the qualification to a greater degree than for a GCSE.
- 3.44 Some centres may see a drop-off in take up for a VCSE in this subject (at least in the short term) which may impact some centres ability to deliver the qualification.
- 3.45 There could be workload implications for schools if they have to work harder at promoting the subject as a VCSE to learners, as well as to parents and careers, particularly given the context of the popularity of the current GCSE.

Impacts on awarding bodies

- 3.46 If the subject was to become a VCSE then this would have a sizeable impact on WJEC's GCSE exam fee income. This in turn could have an impact on the viability of

the overall GCSE offer given the need for high entry subjects to help support the sustainability of some of the lower entry subjects.

- 3.47 In addition to WJEC GCSE exam fee income, this change could potentially have a negative impact on WJECs fee income for the A level qualification.
- 3.48 However for some other awarding bodies creating a VCSE is likely to have a positive impact in terms of being able to develop and offer a qualification in this subject. Additionally, this subject is likely to be attractive to a number of awarding bodies given the relatively large number of potential learners.

Impacts on others

- 3.49 At this stage without further information around what a VCSE qualification in health and social care, and childcare might look like and how it might differ from a GCSE qualification, particularly given the limited opportunity a VCSE qualification would have for direct practical work, it is difficult to assess the potential impact on the further education sector or employers in this sector with any degree of precision.

4. Other Considerations

Equalities Impact Assessment

- 4.1 In our original impact assessment for the broader 14-16 offer we identified whether our proposals were likely to have any impact (positive or negative) or differing effects on different groups who share one or more protected characteristics as part of the Equality Act 2010. As part of this impact assessment, we considered the potential impacts from an individual equalities perspective, but also the impact of intersectionality.
- 4.2 We have not identified any additional impacts beyond those identified in the original impact assessment in respect to the three proposals in this consultation.

Welsh language Impact Assessment

- 4.3 No further impacts on Cymraeg have been identified beyond those in the original consultation. Regardless of whether the qualifications are designed as GCSEs or VCSEs there will be a requirement that they be available through the medium of Welsh and English.

Well-being of Future Generations Act

- 4.4 In the development of these proposals and in our impact assessment we have been mindful of the seven wellbeing goals and the five ways of working. For example, we have involved and collaborated with a range of stakeholders to help develop the consultation proposals and impact assessment.

Rights of the Child

4.5 As part of this impact assessment we have considered the impacts our proposals have on children and young people, recognising the differential impact our proposals may have for different groups of children.