



Department  
for Education

**Consultation Response Form**

**Consultation closing date: 10 May 2013**  
**Your comments must reach us by that date.**

**Government proposals to reform  
vocational qualifications for 16-19 year  
olds**

**Consultation Response Form**



Please mark an 'x' in the box that best describes you as a respondent.

|  |  |   |
|--|--|---|
| <input type="checkbox"/> School/Academy        | <input type="checkbox"/> FE College                                      | <input type="checkbox"/> Sixth Form College                 |
| <input type="checkbox"/> HE Institution        | <input type="checkbox"/> Training Provider                               | <input type="checkbox"/> Sector Representative Organisation |
| <input type="checkbox"/> Awarding Organisation | <input checked="" type="checkbox"/> Employer/Representative Organisation | <input type="checkbox"/> Member of the Public               |
| <input type="checkbox"/> Parent/Carer          | <input type="checkbox"/> Other   |   |

Please Specify:

The Sixth Form Colleges' Association represents the 94 Sixth Form Colleges in England educating over 150,000 16-19 year, 85% of whom follow predominantly Level 3 programmes.

1 Do the three categories of qualifications (academic, Occupational, Applied General) reflect the diversity of qualifications and study aims for the 16-19 cohort?

Yes

No

Not Sure

Comments:

The three categories do, to a certain extent, reflect the diversity of the current set of qualifications, however, they do not reflect the study aims for the 16-19 cohort. Currently, students undertake a mixture of A-levels and vocational qualifications which make up a full learning programme. The three distinct categories of qualifications proposed will make it difficult for students to undertake a range of qualifications covering two or more categories as each category is implying a specific progression route. The three categories are essentially 'pigeonholing' students to a particular progression pathway allowing little manoeuvre for students who may decide to change their pathway at a later stage.

We welcome the parity of esteem objective the proposals sets out, however, this objective will not be successfully achieved through the creation of three categories. The three categories of qualifications automatically create a hierarchy of qualifications, with academic as the more credible and desirable, and effectively 'down-grading' the two vocational categories. We believe that describing the characteristics of 'level-3-ness' that applied to each programme would be a more successful way of achieving parity of esteem. There are current Baccalaureate programmes that attempt this and it was at the heart of the Tomlinson Diploma development. We suggest, therefore, that an overarching framework of skills which sits above the three categories could be created such as research skills, analytical skills etc.

In the consultation, paragraph 1.5 states that there are many students guided by institutions to spend time and effort towards limited value vocational qualifications. However, in the Wolf Report, it stated that Level 3 vocational qualifications and, in particular, Level 3 BTECs and Advanced Diplomas, are robust, challenging and are held in very high esteem with employers and HEIs. Therefore, changes to these qualifications should not be made as parents/students, employers and HEs view these as credible qualifications. These valuable qualifications may be lost within the new proposed categories.

2 Are there examples of vocational qualifications which cannot be effectively categorised in this way?

Yes

No

Not Sure

Comments:

Most vocational qualifications which are being offered currently at Sixth Form Colleges would fall under the Applied General category. There are some vocational qualifications such as CWD (Children's Workforce Diploma) which would fall into the Occupational category which requires a 'licence to practice'.

3 How would these reforms impact on current apprenticeship frameworks?

Comments:

The proposed reforms need to be in line with the recommendations outlined in the Richard Review, in particular, with the design and assessment of vocational qualifications and apprenticeships.

4 Do you agree the new categories of qualification should be called 'academic', 'Occupational' and 'Applied General'?

Academic  
 Not Sure

Occupational

Applied General

Comments:

We do not agree with the categories proposed in the consultation. Focus should be on the broad study programmes students undertake and the overall package offered to students which will be lost through the introduction of specific categories of qualifications. We are concerned about how each category will appear and be described in league tables and whether certain categories would be given more prominence.

The term 'academic' creates a hierarchal structure for qualifications (see response to Q1 above) which devalues qualifications defined under the two vocational categories. Furthermore, many students currently undertake academic qualifications to pursue a career in an occupational field; therefore, this category is misleading and may cause confusion amongst students and parents.

Although Applied General was viewed as a better term than vocational, the word General is a very weak word to describe the level of content, depth and rigour these qualifications currently involve. The word Applied can also lead to misunderstanding and confusion amongst students and parents as the term Applied A-level already is used to describe some A-levels with a vocational focus.

The term Occupational does describe the range of qualifications within this category; however, the wording should be consistent with the other categories.

Words such as 'learning' or 'specialist' could be included in the title categories to give students and parents a better understanding of the content the qualification will include.

Overall, the categories agreed need to be consistent, transparent and clear for employers, HEs and students/parents to fully understand the value of each qualification and the likely progression routes each category is likely to lead to.

5 Do awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required for Applied General and Occupational qualifications?

Yes

No

Not Sure

Comments:

Awarding organisations need at least a two year grace period to redevelop current qualifications to meet the characteristics listed for both vocational categories. However, current L3 vocational qualifications such as BTEC and Advanced Diplomas are highly valued and recognised by employers and HEs, therefore, minimal changes should be made to these.

6 Do you agree with these standards for Applied General Qualifications?

Yes

No

Not Sure

Comments:

Under the external assessment standard, it is vital for the DfE to provide further clarification of what is meant by a 'significant amount' of content that is subject to external assessment. We hope that assessment methods currently used for Level 3 vocational qualifications continue to be recognised as highly appropriate methods for determining a student's ability.

We can see the value of synoptic assessment as a standard for Applied General Qualifications. We believe that assessment is intrinsic to high quality learning, and in this respect, synoptic assessments will help develop specific skills required for practical and project work. For example, business studies students could be asked to produce business plans as part of their synoptic assessment.

We are concerned that the inclusion of Applied General Qualifications in the league tables will require progression specifically to further study. Progression to employment as a pathway should also be included as this would be an appropriate progression route for many students.

7 What is the lowest proportion of the content of an Applied General Qualification that should be subject to external assessment?

Comments:

We are reluctant to specify an exact proportion as all Applied General Qualifications require different methods of assessment to determine a student's ability in terms of application, knowledge and skills. External assessment should be used if this is the most appropriate means of determining and validating a student's performance.

8 How can we best judge whether a qualification is valued by Higher Education Institutions?

Comments:

The simplistic answer is those qualifications which are accepted for access to HE courses!

Preliminary discussions between Higher Education institutions and awarding organisations will be required to ensure the content and skills are sufficient and enough for students to undertake qualifications in Higher Education in that area.

9 a) Do you agree with these standards for Occupational Qualifications?

Yes

No

Not Sure

Comments:

However, we require further clarity on what the employer endorsement standard will involve.

We suggest a system of employing industry standard experts to help deliver and access qualifications.

9 b) Can they be applied across any sector or local area?

Yes

No

Not Sure

Comments:

It is vital that the new standards are clearly explained to SMEs which are the main type of employers engaged with colleges on the delivery and assessment of current qualifications.

10 How can awarding organisations support providers in engaging local employers in delivering and assessing qualifications on the ground?

Comments:

As Sixth Form Colleges offer very few occupational (licence to practice) qualifications this is not a major issue for us or the awarding bodies. CACHE is one exception, and colleges have to engage with local employers to successfully deliver this course.

11 How should we evidence provider engagement with local employers in the delivery and assessment of Occupational Qualifications?

Comments:

This is dependent on the network of employers the provider already engages with. Currently, colleges already have in place good engagement with employers for current occupational qualifications. For example, CACHE qualification and CWD (Children's Workforce Diploma) requires employer engagement due to 'licence to practice' requirement.

12 Should the Skills Funding Agency approve the funding of Occupational Qualifications (irrespective of whether they are on the Qualification and Credit Framework) if a learner is over the age of 18 and under 25 and entitled to funding under the terms of the Adult Entitlement to Learning?

Yes

No

Not Sure

Comments:

Given the current level of unemployment amongst young people in the UK, it is essential that providers help post 18 students gain the right skills and knowledge to be employable or progress to higher or appropriate further education.

13 Should the Skills Funding Agency consider funding certain Applied General Qualifications in the same way? If so, what criteria should be used to identify these?

Yes

No

Not Sure

Comments:

General Applied Qualifications can provide a direct route into employment and should be funded in the same way as Occupational courses. The criteria should be a track record of suitability as appropriate preparation for direct entry to employment. E.g. Travel and Tourism BTEC extended diploma is recognised by some travel firms as acceptable for direct recruitment into the travel industry.

14 Do you have any other comments?

Comments:

We have some concerns about the proposal to disaggregate A-levels from BTEC level 3 and other general and occupational courses in the performance tables. This could act as a serious disincentive for some colleges who would be reluctant to offer students mixed courses for fear of losing their ranking in the tables with the reputational fallout this might bring. We see no reason not to aggregate A-level and BTEC performance at level 3 which allows a broad equivalence of achievement for accountability purposes. We suggest that a simple and acceptable scoring tariff to measure outcomes from advanced vocational qualifications should be adopted similar to UCAS's tariff to calculate points equivalence.

Furthermore, separate reporting also does not reflect the fact that a large number of advanced "vocational" students carry A-level elements within their programmes.

We see little justification in the tables for progression to be reported only when it is to an occupation or a higher course related to the programme of study which will be the case for Applied General and Occupational courses. Applied General and Occupational courses develop skills which can apply to a wide range of further study and/or employment opportunities and this should be acknowledged in any accountability measure.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply –  YES**

**E-mail address for acknowledgement:** [info@sixthformcolleges.org](mailto:info@sixthformcolleges.org)

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Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

|  |                                |
|--|--------------------------------|
| <br>Yes | <input type="checkbox"/><br>No |
|--|--------------------------------|

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**

Completed questionnaires and other responses should be sent to the address shown below by 10 May 2013

Send by post to:  
Department for Education  
Exclusions Team  
Level 2  
Sanctuary Buildings  
Great Smith Street  
London  
SW1P 3BT

Send by e-mail to: [16-19vgCONSULTATION@education.gsi.gov.uk](mailto:16-19vgCONSULTATION@education.gsi.gov.uk)