



Department
for Education

Consultation Response Form

Consultation closing date: 20 November 2013

Your comments must reach us by that date

16-19 Accountability Consultation

If you would prefer to respond online to this consultation please use the following link: <https://www.education.gov.uk/consultations>

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.	<input type="checkbox"/>
Reason for confidentiality:	

Name: Deepa Jethwa	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Sixth Form Colleges' Association	
Address: Local Government House, Smith Square, London, SW1P 3HZ	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Ministerial and Public Communications Division by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please mark the box that best describes you as a respondent.

<input type="checkbox"/> School	<input type="checkbox"/> College	<input checked="" type="checkbox"/> Representative bodies
<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Young Person	<input type="checkbox"/> Awarding Organisation
<input type="checkbox"/> Headteacher/Principal	<input type="checkbox"/> Governor/Governing Body	<input type="checkbox"/> Union
<input type="checkbox"/> Other		

Please Specify:

The Sixth Form Colleges' Association represents the 93 Sixth Form Colleges in England that between them educate over 150,000 16-19 year olds each year.

Proposals for Publication of Data

1 Do you agree that in future only high value level 2 substantial vocational qualifications which meet pre-defined characteristics should be recognised in the Top Line performance measures for 16-19 year olds?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
------------------------------	-----------------------------	--

Comments:

This is entirely dependent on the definition of a 'substantial vocational qualification'. In the consultation document, substantial vocational qualifications are described as '*large qualifications which provide the knowledge and skills necessary to enter a particular trade or skilled occupation e.g. plumbing*'. This does not cover the more general vocational programmes at Level 2 which complement GCSEs in English and Mathematics such as BTEC Business, Sport, Public Services, IT, Health and Social Care, and Performing Arts. BTEC qualifications feature heavily in Sixth Form Colleges as the core of Level 2 programmes, and there is ample evidence (supported by individual case studies) that such programmes support successful progression to Level 3 provision and subsequent progression to employment and/or HE. Furthermore, it is important for students to be given the option to undertake Level 2 'substantial qualifications' which are not specific to a trade which will allow all progression doors open for the future. Such Level 2 programmes should therefore also be viewed as high value level 2 substantial vocational qualifications.

Level 2 qualifications are part of the building blocks required alongside employability skills that should lead to apprenticeships or other level 3 study. All 'substantial vocational qualifications' at level 2 should provide learners with the broad employability skills (independence, problem-solving, team work etc.) needed to access/progress to level 3 qualifications.

2 Should employer recognition, grading and external assessment or moderation be required characteristics for substantial level 2 vocational qualifications in the same way as they are for Technical Level qualifications at level 3?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
------------------------------	-----------------------------	--

Comments:

Again, the issue of definition discussed above is relevant here. In the case of Technical Vocational qualifications at Level 2, then employer recognition would be a logical extension of the work being done with employers on Level 3 Technical qualifications. It is important for assessment approaches to relate to the nature of the qualification and subject.

3 Do you agree that awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required? This is the same time period that was given for the redevelopment of Technical Level qualifications at level 3.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

4 What do you think this category of vocational qualifications should be called and how do you think it should be defined?

Comments:

The category of vocational qualifications should be defined in a similar way to the current Level 2 BTECs. We strongly believe that the current Level 2 BTEC qualifications vigorously challenge young people and provide a sound foundation to progress to employment and further study. They are widely viewed by parents, HE and employers as credible and substantial qualifications. Care should be given with naming yet another category of qualifications as this could further complicate what is likely to be an already complicated set of performance measures.

5 What are your views on the necessity, benefits and implications for students and providers of a best 3 A levels measure?

Comments:

We support the proposal for an average point score per entry based on a student's 3 best A level grades. This approach will reduce the current practice adopted by certain institutions that encourage students to undertake lots of A level qualifications to boost their ranking in league tables. However, changes to the assessment of A-levels in phases will mean that there will be a transitional period whereby 2 different types of A-levels will be offered to students – linear style A-levels and modular style A-levels. Will they be reported separately or will they be deemed as equivalent in the measures?

Clarification is required regarding where AS level performance will be accounted for in the proposed measures. Will it be included under the mixed programme measure?

6 Do you agree that the measures set out in annexes A and B should be the top line and additional data published for students studying at levels one, two and three?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not Sure
------------------------------	-----------------------------	--

Comments:

As 90% of the learning activity in Sixth Form Colleges is at Level 3, our response below is focused on Annex B. This is a poorly constructed question, as it is unreasonable to deliver a yes/no/not sure answer to such a wide range of new measures over three levels!

Students and parents should be able to make informed choices about what to study and where based on clear and reliable information. At the moment, performance tables are presented in a way that highlight exam point score per student and this data is subsequently used by the media to assemble league tables of 'high performing institutions'. The problem with this narrow focus on raw attainment is that it does not take into account the prior educational performance of students – young people that do well in their GCSEs tend to do well in their A level or equivalent qualifications. So we strongly support the inclusion of a progress measure and agree that this is a better way to assess the effectiveness of schools and colleges. It is important that the progress measure is a top line indicator, as in the past, value added data has been buried in (often incomprehensible) spreadsheets on the DfE website, or not published at the same time as the performance tables.

In principle, we welcome the introduction of a destination measure. However, the data published by the DfE earlier this year is still in experimental form and a significant proportion of destinations is still unknown. It was not usual for a quarter of SFC students to be categorised as 'Activity not Captured in Data'. It would be misleading to include destination data in the performance tables until there has been a significant improvement in the quality of the data. In this consultation document only three positive destination measures are included. If these were the headline measures, they would penalise institutions where significant numbers of students went on gap years or deferred entry to higher education.

We are also pleased to see that a completion measure will be included in the tables as this will help to minimise confusion over the use of pass rates. It will also shine a light on the high rate of non-progression and in-year drop out prevalent in some providers.

We are disappointed to see that the AAB measure in 'facilitating subjects' will be retained in the performance tables as additional measures. The list of facilitating subjects is rather arbitrary and includes for example, geography, but not economics. It was never the intention of the Russell Group for facilitating subjects to become a performance measure and using it as one is highly misleading. Our own research

(available here
<http://www.sixthformcolleges.org/sites/default/files/29%207%2013%20sixth%20dimensions%20project%20reportv1.pdf>) has shown that more students from Sixth Form Colleges progress to Russell Group universities without having AAB grades in facilitating subjects than with them. It is important that students continue to make their subject choices based on their own unique circumstances and aspirations, and not on the narrow and rather arbitrary list of facilitating subjects.

The closing the gap measure, but again, could be undermined by data issues. There is no mechanism for Sixth Form Colleges to obtain information on students such as their pupil premium and FSM status and it would therefore prove difficult for this to be accurately captured and recorded. Furthermore, some students may become eligible for pupil premium funding during their time at school (and not just at age 11) and these students will also not be accounted for in the new measure.

7 Do you agree that we should explore how to report the achievement of students at level 2 and 3 taking work-based training (including Apprenticeships) with independent training providers in performance tables?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

Independent training providers are significant players in the delivery of 16-19 qualifications and should therefore be included in the performance tables.

8 What are the issues to consider in reporting the achievement of students in work-based training and in setting minimum standards for these providers?

Comments:

The achievements of students should be reported in the same way irrespective of where they choose to study. It should be possible to compare the performance of students studying the same courses in different sectors, and the same minimum standards should also be in place.

Minimum Standards

9 Do you agree that minimum standards at level 2 should be based on an attainment and completion measure for those taking substantial vocational qualifications?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

As previously stated, if substantial vocational qualifications include Level 2 BTEC qualifications, then we agree that the minimum standards set at level 2 should be based on an attainment and completion measure.

Further clarification is required regarding how the average point score for each student will be aggregated – would a sliding scale or a point scale be used?

10 Do you agree that we should not penalise providers if students leave their course to take up an Apprenticeship, Supported Internship or Traineeship?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

We agree that courses such as apprenticeships, supported internships and traineeships are positive destinations for students to undertake. Students should be able to change to different courses which are more suitable for them, and, therefore, providers should not be penalised.

11 Do you agree that the level 3 minimum standards at 16-19 should be based on progress for academic and Applied General qualifications and on attainment and completion for Technical level qualifications?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

12 Do you agree that we should extend the reporting of the attainment of low, middle and high attainers to the 16-19 performance tables?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Sure
---	-----------------------------	-----------------------------------

Comments:

Currently, key stage 4 performance tables report attainment of low, middle and high attainers, this measure should also be used for 16-19 performance tables for comparability purposes.

13 What categories of destination should we include when reporting the destination of students with learning difficulties and disabilities?

Comments:

In relation to LDD, destination should be reported against personal targets as agreed in individual Education, Health and Care Plans. However, due to the inherent complexities of these learners needs, there must be the flexibility to ensure regular review of progression targets whilst ensuring that learning is the focus rather than purely care.

Destination categories should therefore include further/higher study and appropriate (including supported) employment. Progression targets must also of course include activities designed to support the process of increasing student independence.

14 What other data could be published to create the right incentives for post 16 providers to ensure the best progress and attainment for all their students, including enabling those with learning difficulties and disabilities to prepare for adult life?

Comments:

The proposals in this consultation already include far reaching and wide ranging measures of performance.

15 Do you think the HE model of 'MOOCs' could work in a 16-19 environment?

Yes

No

Not Sure

Comments:

We recognise that at a time where institutions are facing deep funding cuts, MOOCs may be viewed as a viable and alternative approach to delivering the curriculum. However, we feel that 16-18 is a crucial period for young students – their development phase where they need to be engaging with teachers directly for advice, support and guidance. We think that there are elements of MOOC, for example, online discussion forums which could be adopted.

16 If the assessments could be proven to be robust and to meet other key quality criteria, how do you think we could recognise accredited online courses in the accountability system?

Comments:

We think this area is a good and positive development; however, further investigation is required on the current MOOC assessment outcomes.

17 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.).

Comments:

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.	<input type="checkbox"/>
---------------------------------------	--------------------------

E-mail address for acknowledgement: info@sixthformcolleges.org
--

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, please confirm below if you

would be willing to be contacted again from time to time either for research or to send through consultation documents?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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

Thank you for taking time to respond to this consultation.

Completed responses should be sent to the address shown below by 20 November 2013

Send by post to:
Andrew Taylor
Inspections and Accountability Team
Level 2
Department for Education
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: 1619accountability.CONULTATION@education.gsi.gov.uk