



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

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.

Reason for confidentiality:

Name Rod Bristow

Organisation (if applicable) Pearson Education Ltd

Address: 190 High Holborn

London

WC1V 7BH

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 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 checked="" type="checkbox"/> Awarding Organisation	<input type="checkbox"/> Employer/Representative Organisation	<input type="checkbox"/> Member of the Public
<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Other	

Pearson is the world's leading learning company. In the UK, Pearson comprises educational names including Edexcel, BTEC, Longman and Heinemann, as well as internationally known businesses such as Penguin, Dorling Kindersley, and the Financial Times. Pearson's education work combines 150 years of experience with assessment services and online support for learners in more than 70 countries.

Last year, 685,000 learners completed a BTEC Level 2 or 3 (Between 01 June 2011 and 31 May 2012) up from just over 530,000 in the same period the year before.

In 2009/10 (the last year for which data is available), 92,000 BTEC students applied to HEIs up from around 71,000 in 07/08. They successfully started courses in a variety of subjects including Maths, Engineering and Science. 6.4% of students were at Russell Group or 1994 universities.

The views in this response are all those of Pearson, but are supplemented and exemplified with quotes (*in italics*) from some of the thousands of schools, academies and colleges with which we work.

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

X Not Sure

Pearson fully supports the aims of the 16-19 Study Programmes, and believes strongly in the need for all qualifications, whatever categorisation might be applied, to be rigorous, demanding, inclusive and empowering. Any qualification which is not demonstrably 'high quality' should not be offered to learners.

We support the principle that should learners should choose qualifications with full knowledge of what progression routes these are most likely to facilitate, or in some cases cut off. The three categories broadly take into account the fact that some young people will want to progress into traditional higher education degree, others pursue higher level vocational study inside or outside HE, and others will want to progress straight into vocational training or work in a particular job role.

However, we would add that, wherever possible, learners should not be taking decisions at age 16 which will prevent or make it difficult for them to review their ambitions further down the track. All those who have brought up or worked with young people know how diverse this group of learners is at the age of 16, with some certain of the progression route they want to take, and others who are still uncertain. More critically, a high proportion of those who believe they are certain at 16 reach the age of 18 having changed their mind about their preferred destination, often more than once.

Providers interview learners to advise them of the most appropriate courses for their level of learning and their aspirations. However there is a real and legitimate concern that even if having three distinct categories of qualification may help learners to understand the specific purpose of those qualifications, 16 is too early to commit to a particular route that may actually close doors and suppress aspiration as that young person develops.

"I interview learners who are so sure they want to be nurses or midwives but then once on the course they change their minds, and why not? They are 16. I have a learner this year so sure he wanted to be a paramedic and this year he's applied to do business at uni!" [Teacher, FE College] 'I would say most of the learners who start an IT course know they want to work in IT but I think at least half of them change their minds about the subject area within IT as a result of the units they study. We have students who have gone to university to study forensics as a result of the work they did in the two security units. This was certainly not something they wanted to do when they started.

"[Head of Department, FE College].

A concern has also been voiced to us by many providers that while the intention may be to put qualifications into two groups, the end effect will actually be to put learners into those two groups at the age of 16, and thereby to restrict their progression opportunities, whether this restriction be actual or perceived.

To overcome this, our goal must be to guarantee the high quality, recognition and broad progression opportunities of all vocational qualifications taken in the 16-19 phase. **Our key recommendation is that there should be a single set of characteristics and expectations that define high quality vocational provision, whether the principal purpose of the qualification is to support progression to the workplace or to further study, or offers the opportunity to take either path.** Currently, neither list goes far enough in defining the characteristics of 'high quality vocational provision'. In the context of the new Technical Baccalaureate, it is crucial that vocational routes which take young people through higher education and into work are recognised, to avoid the creation of a false dichotomy between vocational education and the skills coveted and required by universities. We would be concerned if the Tech Bacc route was viewed as an "alternative to university" route, since vocational or sector related degree programmes are growing in number, and the qualifications system should respond to this.

Whilst, between them, the three categories probably address most study aims, many qualifications which have proved their value in enabling positive progression display characteristics that cut across the boundaries imposed by the three-way division. We do not, therefore, think it is desirable to disaggregate the characteristics of successful and valued vocational qualifications and reaggregate them into two distinct groups with different stated purposes. The disaggregation / reaggregation exercise risks creating an Applied General route that puts too little emphasis on preparation for employment, while the Occupational route focuses too much on preparation for a narrow route into particular job roles. As a result, in the proposals currently outlined, some of the valuable progression characteristics of existing qualifications could end up being removed in order that the qualification "fits" the criteria of one list or another.

Finally, it is important to note that these categories do not reflect the full diversity of study aims for those who are not yet working at level 3, or those wanting to follow an apprenticeship route. The relationship between the Apprenticeship and Occupational routes needs to be carefully considered. Greater detail on this issue is contained under Question 3.

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

X Yes

No

Not Sure

There are many successful qualifications with a strong track record of supporting progression into both higher education and employment. These draw on the best attributes of all three proposed categories, with the HE input into their design that characterises the Academic, and with the employer input that characterises the Occupational. However they don't have the narrow progression expectations that the proposed Occupational characteristics require, and support progression to a wide range of further destinations. This was confirmed by Alison Wolf in her Review of Vocational Education, where she noted that 'BTEC National Diplomas are [also] valuable in the labour market, and an acknowledged route into Higher Education.'

Almost alone outside of A levels, BTEC Nationals are explicitly recognised by HEFCE in apportioning places under their student number control measures. The numbers using BTECs to apply to HE was just short of 100,000 in 2012, but at the same time only around 35% of all those completing a BTEC course at level 3 choose this route – the rest move successfully into the employment market. The success of BTEC in preparing learners for HE is demonstrated in recently commissioned research (*publication forthcoming, May 2013*). This indicates that BTECs are a successful route for the most able learners to progress to HE. In the degrees most taken by those with a BTEC (Mathematical subjects and computing, Engineering, Architecture and related subjects, and Business and finance) a learner with a BTEC is as or more likely to get a First Class degree than one who had taken A levels. Anecdotally, this is because learners display a balance of technical understanding and independent study skills required at degree level.

These same qualifications prepare learners well for employment - those whose highest level qualification is a BTEC National have an enhanced earnings potential of 20% - very similar to an apprenticeship (22%) and higher than any other vocational qualification [*source: BIS Research Paper 105, Feb 2013*]. The recently commissioned research also shows that a person with BTECs followed by a degree is more likely to be in full-time employment than someone with A levels plus a degree. We are therefore very concerned about a proposal that could weaken the opportunities for learners to progress by requiring qualifications to conform to one partial set of characteristics or another, and focus principally on either progression to further study (Applied General) or to employment in a particular job role (Occupational).

We recommend that there is just one composite and common set of characteristics that

confirm and verify the declared purpose of each qualification. There is more detail about the single list of characteristics in response to question 9a, but in summary the principles are below.

A key principle is that any “vocational” qualification must be able to demonstrate its particular value in ensuring progression to employment, whether or not it facilitates progression to further study in addition to that. The common characteristics will provide for improved mobility for students between routes should they change their mind.

- All ‘non-Academic’ qualifications must declare their purpose primarily as preparation for further study **and** progression to employment, **or** for direct entry to a particular job role. In some cases both may be possible.
- There are common characteristics that all qualifications must meet. Through their contribution to the design of the qualification and their support for the finished product, employers (and HE where relevant) will confirm that these characteristics have been met.

The advantage of this is that it is clearly stated in every specification what the potential progression routes are, and these are verified by inclusion on the high quality list.

This proposal would still allow for the creation of two lists to support understanding of the opportunities offered by the qualifications, or for accountability purposes – **however this distinction is based on the stated primary purpose, rather than conforming to one of two different and partial definitions of ‘high quality’**. This removes the risk of hierarchy between routes and instead ensures a baseline of high quality.

3 How would these reforms impact on current apprenticeship frameworks?

It is not clear how the Occupational route is properly and fully distinguished from the apprenticeship route for this age group. The Richard Review has made helpful proposals about the purpose of apprenticeships, but learners who know at 16 that they want to progress to employment in a particular sector will need very clear advice about whether the Occupational or the Apprenticeship route is the more appropriate for their aspirations, and this area of advice and guidance, particularly in schools, is notoriously weak. Employers too, when considering recruitment options, will need to understand how the two routes align, given that there are many similarities.

The other significant impact on apprenticeship frameworks is the extent to which the characteristics proposed for the Occupational route could require changes to existing qualifications that could make them ineligible as Technical Certificates, thereby reducing the opportunities for moving easily between learning routes.

A proliferation of similar but slightly different qualifications may be the result. This would not only add to the confusion and difficulty for a learner in selecting a course, but would also create potential problems for providers who might find it harder to put on viable courses if student numbers are fragmented.

The current frameworks are defined by the SASE, so if these proposed reforms go ahead the SASE would need to be redrafted to accommodate the revised qualifications and avoid the issues above. We would support this, as redrafting the SASE to take account of qualifications designed to conform to these VQ reform principles would open up real opportunities for learners to move more easily from taught vocational courses to an apprenticeship.

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

Academic

Occupational

Applied General

X Not Sure

The benefit to learners and end users of separating out two aspects of vocational qualifications is not clear, given that the best examples among existing qualifications are able to deliver both outcomes very effectively. Pearson absolutely supports the aim to better inform learners and end users about qualifications, and ensure that these qualifications are of high quality, but we believe that we should bring all eligible provision up to the quality of the best rather than accept that vocational qualifications can only deliver one set of worthwhile outcomes or another – either preparation for further study, or preparation for work in a particular job role. There is an established and well respected place for qualifications that do both.

Pushing young people in specific separate directions at the age of 16 through the choice of highly differentiated qualification categories is a worrying development that risks closing down progression routes at a time when the economy is fast changing and we need to be supporting the development of recognised and coveted transferable skills that keep their options open.

This will require qualifications which are not designed to meet one narrow range of characteristics or another, but qualifications which meet a single broader set of characteristics, and which have a clearly defined purpose verified by those who will recruit the students when they complete their courses.

What is important is that the *purposes* of a qualification are distinct, not that there are two different sets of characteristics. If explicit categorisation is felt to be helpful for those using the qualifications (and our conversations with providers and end-users suggest opinion is divided) then we feel the single terms 'General' rather than 'Academic', 'Applied' rather than 'Applied General' and 'Occupational' are most appropriate.

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?

X Yes

No

Not Sure

Pearson continually reviews its qualification portfolio to ensure that the qualifications continue to meet the needs of learners and end users. There is already a programme of work underway for level 3 qualifications that will ensure they continue to meet the current expectations of higher education and employers and reference international standards. However if there are new requirements that are in some way different from those which already feature, or that we are already incorporating, then the two-year period becomes more important.

The two-year grace period will be particularly important for providers to enable them to prepare for revised qualifications. Even for first teaching in 2016, marketing and planning will start in 2014 and will need to be based on a good knowledge of the revised qualifications. If the outcomes of this consultation are known in summer 2013, that does not leave a lot of time for the development and accreditation work, particularly to build in fresh engagement with employers and HE. 2016 first teaching is realistically the earliest any requirements for reform can be introduced.

A third reason for the two-year grace period is the first teaching of revised GCSEs and A levels in 2015. A two-year grace period would allow first teaching of revised vocational qualifications in 2016.

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

Yes

No

X Not Sure

As stated above, we question the appropriateness of separating these characteristics so distinctively from those applied to 'Occupational' qualifications. The detail beneath the expectations also requires further consideration.

BTEC Nationals at level 3 have recognition from both employers and HE, and through the options and pathways they offer have a strong track record in preparing young people for both employment and higher study. It is artificial to take some characteristics of a high quality vocational qualification and put them under one heading, and take other characteristics and put them under a second heading – the strength of the best qualifications is that they meet all the characteristics.

We do not believe that learners should be required to choose a qualification that delivers one partial aspect or another. So while we support the headings used in this section, we would want to see them brought together with the ones applied to the Occupational route and raise the bar to give a single definition of what a high quality vocational learning experience should provide.

Some points of detail:

External assessment:

The definition used is the same as the one for the KS4 list; we would expect the same interpretation of this definition to be applied at KS5 for strongly practical subjects such as Art and Design or Performing Arts.

External assessment has an important role in complementing the validity of teacher assessment and preparing learners for further study where that subject requires it at HE. However teacher assessment will remain an important and valid way for many key skills to be assessed, so we must focus on securing strong quality assurance and support for teachers to ensure it is robust.

Appropriate content:

We agree that qualifications should enable young people to acquire a 'significant' body of sector knowledge, and that 'specialist or skills-based content ... is important where appropriate and in proportion to the core.'

It will be critical to define 'specialist', 'skills-based' and 'in proportion'. The most successful current qualifications are successful precisely because they do offer the

opportunity to develop some specialist skills and/or knowledge as part of the overall qualification. Employers and HE value, and young people choose, this approach to learning because they require a blend of knowledge and application. This strength needs to be retained.

The right mechanism to confirm 'appropriate content' for all vocational qualifications - including the 'Occupational' ones (which should also explicitly have to demonstrate this characteristic) - is the approval of the end user who will recruit the successful learner. If employers and, where appropriate, HE have been involved in the design and approval of the qualification, the content will be appropriate without this characteristic needing to try to define 'specialist', 'skills-based' and 'in proportion'.

Progression:

We are concerned that there is no requirement for direct HE and employer input into the design and approval of Applied General qualifications in addition to the suggested evidence. This is critical to ensuring that they are valuable for learners. If we cannot be sure that qualifications meet employer or HE requirements, they do not merit inclusion on the "high quality" list.

We would strongly recommend that it is in the interests of young people that the value of qualifications is assured through such explicit engagement. *[See also the response to Q8]*

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

It is difficult to recommend any single weighting for external assessment, as it will depend on the size of the qualification and the nature of its content – the mode of assessment should always support validity of the assessment. In the smallest 150glh qualifications there might be up to 60glh assessed externally, but in the largest ones, equivalent to 3 A levels, 120glh may well be sufficient.

As with the 'appropriate content' above, these qualifications should have a significant input from HE and employers at the design stage, and any decisions about a weighting should be taken in consultation with them. Evidence that they support the resulting qualification design should confirm the appropriateness of the weighting rather than there being any pre-determined minimum.

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

It should be a requirement that all qualifications that are intended to support progression to HE should have the explicit involvement of HE at the design stage, and HE support for the accredited qualification. This will give an up-front indication that it has the potential to support learner progression to higher study.

Longer term, this can be verified by evidence of the qualification being used successfully by learners to support applications to HE. We should start thinking now about what that data capture should look like.

There should be a degree of caution in how this data is interpreted, however, as it would be inappropriate to set a crude benchmark of numbers or proportions to apply to all qualifications, when for some progression to HE will be a primary purpose and for others it will be just one of several purposes. The aim should be to have a basket of evidence that demonstrates the success of a qualification in supporting progression to positive destinations.

It should also be essential that any qualification in this area should be valued by employers, although not necessarily for progression to a particular work role. The report in March from the Commission for Adult Vocational Teaching and Learning saw vocational qualifications as having 'a clear line of sight to work'. We feel that this is a helpful way to distinguish the overarching vocational purpose from the academic, and therefore **we recommend that all qualifications put forward as 'high quality vocational', should demonstrate that they are valued by employers, even where their purpose also relates to further study.**

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

Yes

No

X Not Sure

As has been stated in question 6, we believe that neither list goes far enough in defining 'high quality vocational provision' and we do not believe that creating two separate sets of characteristics is in the interests of learners. There is a continuum of learner interests, needs and aspirations, and qualifications should span this continuum with as few artificial divides and as little narrowing of opportunity as possible, while properly preparing them for the next stage of their careers. Proposals for the 'Technical Baccalaureate' set out a high level of expectation for the most able learners following vocational qualifications, and many of these learners will want to use achievement in the TechBacc to progress to HE. It is therefore essential that the characteristics to define 'high quality vocational provision' are common across all vocational provision and therefore give all vocational learners access to the TechBacc.

The relatively narrow set of characteristics currently proposed for this category will result in relatively narrow qualifications. These may well have an important place in study programmes for young people, but they are likely to need alongside them some more 'general' provision that develops the underpinning knowledge for the sector. This is especially important if the young person has aspirations for study at a higher level. A programme dominated by qualifications conforming to these characteristics is likely to strongly determine and restrict progression opportunities outside of a well-defined sector or sub-sector.

Some points of detail:

Employer endorsement:

This should be a requirement for all vocational qualifications. Awarding organisations should be able to demonstrate at the point of accreditation that an appropriate range of employers from the sector has been engaged in the design of the qualification, and has supported the final version put forward for accreditation.

Much of this work will take place behind the scenes, and in many cases employers will not want to endorse publicly a particular qualification. This may be because attaching their brand to a product from another business is simply not appropriate; it may be because they do not want to mislead learners into thinking that there is any implicit link to a possible progression opportunity with that organisation. The guarantee to learners should be that there is no qualification on the recognised list that has not had the appropriate involvement of sector employers, but not to expect public declarations of

support.

We support, in principle, the aspiration to have local employers involved in the delivery, assessment and award of qualifications aimed at progression to work in a particular job role. This undoubtedly can provide the richest learning experience for a young person on such a programme. We need to balance this with risks to equality of access. For example, it could be a limiting factor if a sufficient level of commitment could not be gained from local employers – not because of the quality of the provision but because of other commitments and priorities on the part of the employers – which would result in a course not going ahead. Worse, the short notice withdrawal of an employer could put a successful course with enrolled learners in jeopardy.

This level of employer involvement is an aspiration that should not be lost. We feel it is more likely that it will operate through centres meeting Awarding Organisation approval processes than through conditions attached to any particular qualification. Pearson will commit to working with government, employers and providers to developing models that will draw on best practice from high performing jurisdictions and enable it to become as widespread as possible.

Assessment:

We agree that there are elements in a vocational qualification where specific competences may be required of the assessor, and in some qualifications this could be a substantial element. However unless this is a very specialist qualification it is unlikely that this requirement need apply across the whole. The concept of 'mastery' as a basic principle is also to be questioned in a qualification which is preparation for progression to employment where further specific training is likely to be required. In a similar vein, while there will be some qualifications where a 16-19 year old is studying with the aim of achieving a 'licence to practice', these are unlikely to be typical of the provision for those at that age in full-time study.

There may also issue of recruitment and retention if assessors are to have 'recent' industry experience. How this is to be defined needs to be carefully considered.

It is right that employers should have a significant role in defining standards, but there is a risk to comparability if there is too much devolution to the local area. The agreed standard needs to be applied consistently at a national level, and so the awarding organisation must be able to manage this. There also needs to be comparability between standards applied to qualifications on different lists – computing / IT and Business / Economics qualifications could be represented in all three lists for example.

Progression:

The proposed measure of success of a qualification in the 'Occupational' category will be that 'a significant proportion of students ... should progress to employment or a

relevant degree ... that qualifies entry to the occupation or a related occupation.'

This implies that a learner embarking on an 'occupational' qualification is being prepared for a very narrow range of opportunities. This would leave little flexibility should their interests and ambitions, or the needs of the labour market, change. We also hear from HE representatives that it is not necessarily the detailed prior knowledge and skills that best prepares a learner for progression to a degree course, but their broader study skills, and an ability to learn and apply their knowledge and skills in a range of contexts. With careers and specific job roles changing so rapidly learners must develop and demonstrate the facility to adapt knowledge to new contexts, so a narrow definition as currently proposed for 'occupational' qualifications is not in the interests of learners or the development of a flexible and adaptable workforce.

We recommend that a better way of determining whether a qualification remains on the list would be to require that higher education and employers have verified that the qualification is suitable for progression purposes and, over time, that the track record of those obtaining the qualification indicates that this is the case.

Key recommendation:

There should be a single list of characteristics for all 'non-academic' qualifications. All such qualifications must state their principal purpose(s), and meet all of characteristics 1-6 below. Where the principal purpose of the qualification is preparation for further study and broad employment readiness, characteristics will be evidenced by the involvement and support of HE and employers; where the principal purpose is preparation for progression to work in a particular job role, characteristics will be evidenced by the involvement and support of employers, with the involvement also of HE where progression to higher study is also an aim. Qualifications which are intended as preparation for working in a particular job role must meet characteristic 7 in addition.

- 1. *Size* – as proposed, the minimum size for all qualifications should be 150 glh**
- 2. *Grading* – the awarding organisation should explain and justify why it has chosen to grade or not grade each qualification. The justification should include how use of the qualification by HE and/or employers has fed into that decision on grading.**
- 3. *Assessment* – vocational qualifications are typified by a broad range of approaches to assessment, and the guiding principle should be that the assessment is fit for purpose by being valid and reliable. Nevertheless qualifications that count towards performance tables should have an appropriate amount of content that is subject to external assessment.**

There should be evidence that HE and employers have contributed to the decisions about the balance between different forms of assessment, and awarding organisations should justify, drawing on this evidence, any instances where external assessment has not been required by employers or HE.

All qualifications must demonstrate synoptic assessment, i.e. a candidate is able to show that they can draw on all of the skills, techniques, concepts and knowledge about a vocational area or particular role in an integrated way. This could take the form of an assessed end-of-course project, an examination or other activity. In unit-based QCF qualifications this may require an additional unit to provide synoptic assessment.

- 1. Appropriate content – Qualifications should be able to demonstrate that they will support young people to progress through the study of content appropriate to the broad vocational sector or particular job role, depending on the purpose of the qualification. This must be validated through evidence of HE and/or employer involvement in the selection of content for the qualification.**
- 2. Progression – awarding organisations should provide evidence that young people who complete the qualification are able to go on to study at a higher level, and/or are prepared for employment in the relevant sector. This could be demonstrated, for example, through support from HE institutions and/or employers that confirms they would consider an applicant holding the qualification to be appropriately prepared for recruitment.**
- 3. Proven track record – in order to demonstrate track record, a qualification will need to have been completed by at least 100 young people in at least five centres during the first year that it was awarded.**
- 4. Employer engagement – where the purpose of a qualification is stated as preparation for a particular job role it must have credibility with employers. In addition to the evidenced involvement of employers in the design of the qualification, delivery and assessment should be undertaken in association with those having recent industry experience. In some cases this assessment will be attesting to occupational mastery.**

None of these characteristics should point to a qualification being accredited on the QCF or the NQF; the framework used should be the one that will be most appropriate for the qualification and the needs of learners and end-users.

We would be happy to discuss what the precise nature of the evidence that will confirm employer and HE support could be if that was needed before publication of the Technical Guidance.

Alternatively this level of detail could be agreed across Awarding Organisations immediately after publication of the Guidance. It will be important not to create a demand on employers that they might not be able to meet, but equally it will be important for learners that they know employers have confirmed the value of the qualification they are aiming to achieve.

We would propose that there are representatives from at least three different employers directly involved in the design of the qualification, and a further 12 who will support the qualification once it is fully developed. A similar minimum level of involvement should be expected from HE where that is needed.

DfE should specify the wording that they want the employers and HE to sign up to – for example 'We believe that this qualification provides good preparation for further study / employment in the xxxxx sector, and we would give serious consideration to any applicant holding this qualification.'

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

Yes

No

X Not Sure

The principles should be applicable across all sectors; however local factors will inevitably intervene. Aspects such as the size of catchment area of a provider, rurality and transport links, and the local economy will all impact on what can be offered.

The emerging model of LEPs must also be taken into account; if they become responsible for commissioning provision then this should ensure that local priorities are addressed.

There should however be a limit on the extent to which provision is moulded to the local area; if it looks exclusively at local opportunities and needs it will not promote mobility and, possibly, the development and acquisition of transferable skills. As currently proposed there is a risk that barriers are created for people who want to move where employment structures and needs are different.

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

Given the number, the spread and the specialisms of providers around the country, primary responsibility for engaging local employers must remain with the providers.

From the point of view of employer input into delivery, this is likely to derive particularly from the work done at the design stage, where content or activities can be built in that have been designed with employers in a way that will best work in local contexts.

Awarding organisations require the provider to be responsible for the quality assurance of assessment and awarding, and so AOs should develop advice to colleges on how they can involve employers in their assessment and awarding processes.

Practical ways to make this happen range from the direct 'accreditation' of employers by Awarding Organisations through to detailed support for schools and colleges in the way they can best work with their local employers. Pearson is already working on proposals for this, and will engage with DfE, provider and employer groups to find the best ways forward.

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

From an external perspective it is Ofsted's role to report on how effectively a provider is engaging with local employers in the delivery of teaching and learning, and the awarding organisation's responsibility to ensure that providers are meeting requirements that relate to the delivery and assessment of qualifications.

Providers will need to confirm to the AO that such requirements have been met.

This could take the form of evidence from institutional business plans, governance arrangements and local employer forums.

It is likely that other external bodies could also be seeking evidence in the future – provision that has been commissioned by LEPs may be tied to local employer involvement.

Any requirements built into the qualification for local employer involvement will need to be considered very carefully; if a learner's achievement depends on the involvement of a local employer whose ability to engage could be stopped at short notice we would be adding an unacceptable level of risk to the system – see the response to question 9(a) above.

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?

X Yes

No

Not Sure

Learners should not be denied access to high quality qualifications that offer meaningful learning and achievement and support significant progression and job outcomes simply on the grounds of the framework on which the qualification have has been developed. If a learner is entitled to be funded (or to a loan) for a qualification, then they should have access to the qualification which is most suitable for their learning needs.

Some kinds of educational programmes benefit from being developed on the NQF and in these cases it is appropriate for these to be funded (or to be eligible for loans) for eligible learners regardless of the age of the learner. There are many learners above – sometimes just slightly above – the 16-19 age group who would be better served in terms of their progression needs by an offer of a substantial qualification, which has been developed on the NQF. Many others will find a QCF qualification more suited to their needs.

We would recommend that any qualifications identified as *high quality vocational provision* are accepted as an exception to a more general confirmation of the value of QCF qualifications to the majority of post-19 learners. The critical rationale for this is that there are certain full-time programmes that are recognised pathways to university, further study and employment, and which require synoptic structures and approaches to grading and compensation that can, in the main, only be delivered through the NQF.

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?

X Yes

No

Not Sure

Please see the full answer and recommendations above.

In addition, A levels and GCSEs are currently funded for eligible learners over the age of 18 and under 25 because they are highly valued as offering meaningful learning and achievement and supporting significant progression and job outcomes. They are the most widely accepted route to university. BTECs, which could, depending on the outcome of this consultation, be categorised as Applied General, are the next largest category of qualifications accepted as a route to university (around 100,000 go to university now each year with a BTEC). Older learners eligible for funding (or loans) should not be prevented from following this route.

14 Do you have any other comments?

Pearson fully supports the aims of ensuring that all qualifications made available to young people are of high quality, that their purpose is clear, and that they deliver the progression aspirations they claim.

However we strongly believe that the proposal to categorise qualifications into 'Applied General' and 'Occupational' by two different sets of characteristics risks leading to a reduction in the quality of current qualifications. There should be a single set of characteristics that demands a common demonstration of high quality for all qualifications, as detailed in the response to question 9a. This would still allow for categorisation, but by difference of *purpose* rather than difference of *characteristics*.

Finally, we would note that being well-prepared for progression to HE or to the workplace is not only a function of the subject or sector qualification a young person takes, but also of the accompanying wider programme of study and employability skills that the 16-19 reforms are quite properly requiring. Pearson is fully supportive of and engaged in this work.

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 X

E-mail address for acknowledgement: James.dobson@pearson.com

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?

X	<input type="checkbox"/>
Yes	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.