



Department
for Education

Consultation Response Form

Consultation closing date: 20 November 2013

Your comments must reach us by that date

16-19 Accountability Consultation

Response from Pearson

Information page

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: Rod Bristow	
Please tick if you are responding on behalf of your organisation.	<input checked="" type="checkbox"/>
Name of Organisation (if applicable): Pearson	
Address: 190 High Holborn, London WC1V 7BH	

Consultation questions

Pearson views this as an extremely important review which we fully support. We have included a full paper as an annex to this submission (see page 17) that makes a number of recommendations at a higher level than can be included in the question format here. We hope these will help move forward the three key aims of the review:

- Sharper accountability.
- Clear, reliable information for students and parents.
- Incentives to deliver English and Maths post 16.

We make suggestions which we think will make the accountability measures more effective, simpler to understand and better align the interests of institution with those of the student.

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

We agree that only high value qualifications should be included.

It is already policy for level 2 qualifications at KS4 and level 3 qualifications post-16 that only those meeting pre-defined characteristics are recognised in performance tables. We should therefore expect that the same policy will be applied to level 2 qualifications post-16.

We think the proposed definition of these qualifications is too restrictive and will put a cap on student progression. We make alternative proposals

It is the *nature* of these characteristics, rather than their existence, that is the critical issue. At present it is proposed that these qualifications should be aimed at helping students into level 2 employment, and we are concerned that they will not adequately support progression to higher level education as well as to employment. Please see the accompanying paper from Pearson that picks up this issue in more detail.

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

We make detailed suggestions in our paper on these points.

Employer recognition is relevant only for some of the qualifications.

Not all qualification provision at level 2 that is appropriate for students aged 16-19 leads directly to a trade or skilled occupation, and therefore employer recognition should not be necessary for all approved qualifications. Those qualifications which have as their purpose preparation for direct progression to employment should be explicitly recognised by employers. Other qualifications, whose purpose is to prepare students for further study at level 3, should demonstrate their track record in achieving this purpose.

Grading is essential for all these qualifications

As with KS4 and 16-19 level 3 approved qualifications, all post-16 level 2 approved qualifications should be graded and this is essential to support the need for accurate measurement of progress as well as to give employers and others greater confidence and understanding of the value of the qualification.

Assessment should be rigorous and relevant

These qualifications should be required to demonstrate a rigorous approach to assessment. External assessment is one aspect of demonstrating rigour, but its contribution to ensuring rigour should not be over-emphasised. It should be part of a balanced approach alongside high levels of external quality assurance of internal assessment through verification or moderation.

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
-----------------------------------------	-----------------------------	-----------------------------------

Many qualifications will not need redevelopment – but for those that do, 2 years is sufficient.

Where new qualifications are needed in order to meet the needs of students, then a 2-year period of grace will give adequate development time for awarding organisations and implementation time for colleges.

However we believe that the level 2 qualifications already approved for KS4 performance tables are entirely appropriate for a great many students aged 16-19 and will support their progression to further study. It is important that the characteristics for level 2 qualifications allow recognition of these. Please see the accompanying paper for more details.

The KS4 qualifications were deliberately not designed to deliver specialist content, and so for those level 2 students looking to progress directly to employment we support the extension of the approved list to incorporate qualifications which will provide the necessary specialist content.

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

Pearson recommends that this category of qualifications is called 'Level 2 qualifications approved for 16-19 performance tables'.

Defining this category correctly is the most important part of this exercise. Students who do not have sufficient level 2 achievement at 16 to embark on a level 3 course should have a range of appropriate options available to them. One of these would be specialist level 2 qualifications that lead directly towards a trade or skilled occupation, but another equally important route is for those who wish to progress to further study at level 3 and beyond. At present, the proposals do not appear to recognise this second route.

Pearson has detailed evidence of the take-up and success of post-16 level 2 qualifications designed to support progress to further study, tracking through to success at level 3. Full details are in the paper that accompanies this response.

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

A single progress measure must be the key way in which the value of an institution is judged – by students and by the Government.

We believe that the information published in performance tables should be clear and help students make informed choices about their options for post-16 study. We recommend that unnecessary and unhelpful complexity is avoided.

We believe that the focus of reporting should be on the measures used for minimum standards.

Pearson believes that the current proposal to report a number of different measures for Academic qualifications is potentially too complex and confusing. However it is helpful for prospective students to have access to this information so they can interrogate the headlines in more detail. It would therefore be appropriate to make the detail below the headline measures easily available on demand. This would enable students and others to select the data that would give them the additional information to understand particular aspects of institutional performance.

The 'Best 3 A levels measure' should be one of many measures reported on demand below the headline 'minimum standard' measure

A wide range of additional data on various aspects of a provider's performance should

be provided on demand below the headline measure. This should include 'best 3 A levels', but should also include, for example, value added data at individual subject level to help inform prospective students.

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

We support the general approach but think it is too complex as proposed. We make suggestions for better focus and clarity.

Pearson strongly supports the move towards the use of progress measures for reporting on Academic and Applied General provision. This is in line with the approach recently announced for KS4, and we believe it is right to build on this approach.

However we have particular concerns about the proposals set out in these annexes for level 2 and for Technical Level provision. In addition we believe that there are simply too many measures being proposed for headline publication that will create unnecessary complexity and are more likely to confuse than enlighten.

Progress should be used consistently as the key metric for all three pathways: academic, Applied general and Technical level.

Pearson fully supports the overall direction of travel in the accountability system, which is to focus headline reporting on the progress made by students. We would wish to see this applied to 16-19 level 2 and Technical Level qualifications as well. We recognise that at this stage there may be some difficulties, not least because of ungraded qualifications, but this should not prevent an intention to adopt a progress measure. We strongly recommend that reporting against progress be used as the sole minimum standard.

Annex A:

A mixed measure combining attainment with completion introduces unnecessary confusion and is not recommended

In the mean time we have strong concerns about using the proposed combined completion and attainment as the key measure. These two sets of data report very different aspects of a provider's outcomes, and combining them means that the

measure will say nothing clear about either. We recognise that without reporting completion there is a counter-incentive to move students off a course if they are not going to achieve, and so we recommend that the two separate measures are reported alongside each other.

As explained more fully in our accompanying paper, the characteristics that will define approved level 2 provision must recognise the range of purposes these qualifications serve. In this respect, the proposed 'Level 2 Substantial Vocational Qualifications' measure is of particular concern. It would report on *'the proportion of students studying at level 2 that are studying qualifications which lead to a recognised trade or occupation, [allowing students] to be able to judge the likelihood of them gaining qualifications which will be of real value in securing employment.'* As reported by Alison Wolf in her review of vocational qualifications, the number of jobs available for those educated or trained to level 2 is limited and decreasing. Students with insufficient achievement at level 2 by the end of KS4 should be encouraged to add to their existing achievement and progress to further study at level 3. This is already the route taken by large numbers of students each year, and for many of those students a further goal is to progress to HE before they ultimately move into employment. Indeed, the proposed destination measure will report on *'how effectively providers enable their students to progress to further learning or employment'* – yet all the information about the proposed list of recognised L2 qualifications implies that it will feature only those qualifications designed to lead directly into employment. We therefore strongly recommend that this measure recognises a wide range of high quality level 2 qualifications which between them will support both direct progression to employment and progression to higher level study.

It is right to report attainment in mathematics and English at level 2 and this can and should be reported as a progress measure.

We fully support the proposed measure to report attainment in L2 mathematics and English, and welcome the intention to include other qualifications alongside GCSEs where appropriate. It is of great importance that those who have not gained a 'good pass' at GCSE in one or both of these subjects are given every opportunity to reach the levels of achievement necessary for future employment. For many it will not be further attempts at GCSE that will best motivate them or best prepare them, and it is important that awarding organisations, post-16 providers, employers and DfE work together in the coming months to ensure that there is an appropriate range of high quality provision.

Annex B:

Technical level provision should be reported as a progress measure.

We welcome the use of progress measures to report on Academic and Applied General

provision. However, as with L2 reporting, we believe that this approach would be right for Technical Level provision too. We recognise the issues that mean this is not currently feasible, but again urge that it should be the declared intention to move to using this measure as soon as it is.

Combined measures should be avoided.

The same concerns about the use of a combined completion and attainment measure apply as described in the response to annexe A above, and the same recommendation is made about the separate reporting of completion and attainment.

Students should be able to drill down on progress at a more granular level.

The next set of measures showing absolute attainment divide up academic attainment too finely into different aspects that are potentially confusing for someone looking to make an informed choice about where to study. Rather than publish just the further range of tables proposed that provide attainment data re-analysed in slightly different ways we recommend that the prospective student or their adviser should be able to drill down into the data that have contributed to the headline progress measures to find the information at the next level that is most relevant to their progression aspirations. Please see the accompanying paper for more information.

Destination information should be made available in a consistent format to allow comparison between institutions.

Alongside progress measures, destination data should be the most important measure of a provider's success. Progress shows how well the provider has done in bringing the student on, while destination data then shows if this has actually enabled them to move on to a positive destination. We recognise the issues with the current experimental releases of destination data and that more work is needed to make this information fully robust, but we strongly recommend that the work is done to allow this measure to be used with confidence by prospective students looking at institutional performance in all four main categories (L2, Academic, Applied General and Technical Level).

The range of measures should be simplified where possible.

We question the value in continuing to publish the AAB in two and three facilitating subjects at A level measure, given the clarification issued by the Russell Group about the actual purpose and use of this term. If it is to be continued then the table should just be 'AAB in two facilitating subjects'. This would still capture those who achieved three, but would give a more accurate message about what universities actually look for. As with the 'Best 3 A levels' table, it should be made available at the next level below publication.

The TechBacc measure should be improved.

We do not support the introduction of the TechBacc with the structure as proposed. By describing it as recognising 'the highest level of technical training' it immediately suggests that all those who do not achieve it have fallen short in some way, thus devaluing the achievements of the vast majority of students on vocational courses. This is a particular concern when the combination of qualifications involved is so narrow.

It is only available to students taking a Technical Level qualification, which will exclude many taking a vocational qualification via an Applied General route. We would therefore recommend that it be extended to include all vocational qualifications approved for performance tables.

- Many vocational qualifications already incorporate a significant Project element, and so requiring achievement of the Extended Project in addition does not add significantly to students' achievement and would be repetitive. Some, such as Engineering, typically include level 3 mathematics units. We recommend that where either or both of these elements are confirmed within a qualification they could be a proxy for the relevant free-standing component of the TechBacc.
- For many routes to employment achievement of level 2 mathematics is sufficient and taking a level 3 mathematics qualification may not add the greatest value when curriculum time is limited – for example students may be better prepared for many roles in Performing Arts, Hospitality, Sport and other sectors by taking an additional specialist qualification.

There is also the question of incentives – as long as it is only a performance measure rather than a qualification there is no incentive for the student to achieve the required combination. On the other hand, it cannot become a qualification for the student to achieve as long as the term is the registered trademark of a single awarding body. We therefore believe that this proposal needs further discussion outside this consultation before it can be considered for successful introduction.

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
-------------------------------------	-----	--------------------------	----	--------------------------	----------

All providers of recognised qualifications to this age group who are using public money to deliver them should be in scope for reporting.

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?

Work-based training providers operate differently from FE colleges and schools, and so there is further work needed to assess the impact of reporting on achievement. For example:

- For most training providers, 16-19 provision is a minority activity, and there is a risk that they are judged on a small proportion of their overall business.
- Much of the 16-19 provision they deliver is under sub-contract from an FE college or school, where the results and accountability will already sit.
- Many of the qualifications being delivered to 16-19 year olds will be components of an apprenticeship. It is not yet clear whether it is the intention to report achievement at the level of the components or the whole.
- providers who specialise in 'harder to help' students may be penalised by specific achievement measures where achievement is more commonly defined by distance travelled than qualification gained and where a job or work experience is a successful outcome.

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

We do not believe a combined attainment and completion measure is appropriate, for the reasons given in response to Question 6 above and in our accompanying paper.

It is also hard to agree with something that is not yet defined; until there is a clear definition of the 'substantial vocational qualifications' that will be recognised for performance tables, through their characteristics, it is impossible to know if any measure would be applied to an appropriate group of qualifications.

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
-----------------------------------------	-----------------------------	-----------------------------------

We agree – however....

A good college will review the progress of students and if for personal reasons it is in a student's best interests to amend their original learning aim it would be quite wrong for the college to have an incentive to ignore this. This would be a concern in relation to any student, but it could have a particular impact on disadvantaged and disabled students.

Some instances of non-completion are entirely outside a provider's control, and these should also not be penalised if an accurate picture is to be provided. Non-completion for medical reasons would be an example.

Any student who leaves the course for a variety of legitimate reasons should not lead to a penalty on the provider. An Apprenticeship, Supported Internship or Traineeship are just three examples – but we recommend that the list should be more inclusive than this.

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

All three pathways should have minimum standards based on progress.

We believe that for all provision the best measure is progress, along with destinations. We do not accept that for Technical Level qualifications it will not be feasible to apply a progress measure to these qualifications. If this cannot be done immediately, attainment should be used.

We do not believe that a combined attainment and completion measure is appropriate since this makes it impossible for a student to see the value that an institution can add to their progress.

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
-------------------------------------	-----	--------------------------	----	--------------------------	----------

This is useful information for those advising students about their progression to post-16 study and could be part of the wider information available on demand below the headlines.

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

The implied emphasis on progression to employment is too narrow for this group, and reporting would need to recognise destinations including

- Voluntary work
- Independent living
- Support / mentoring role with peers

Because of the complexity of identifying positive destinations for this group, which may often come down to needing a lower level of support in some way, we recommend that this should not be a data-driven measure.

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?

It is important to have some measures that will incentivise providers to recruit those with learning difficulties and disabilities, and to ensure that the measures proposed do not create an incentive not to recruit them. We have a concern that proposing only a few exceptions to completion (Q10) could act to create this disincentive.

An additional measure that would create an incentive to recruit students in this group would be to report their outcomes separately, as is proposed for the results for students who have been in receipt of the pupil premium. However for both these measures we would recommend that the measure is based on progress rather than absolute attainment.

Schools and colleges could also be required to report on the proportion of applicants with learning difficulties or disabilities who are accepted onto a programme.

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

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

The model may need some adaptation to best work with the different range of students involved, and there is a lot more exploration to be done to fully understand the opportunities. A simple question in a consultation on accountability does not seem to be the best place to take this thinking further.

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?

If the question is about MOOCs as delivery platforms, then they do not come into the scope of this consultation. If the assessment of a MOOC leads to a recognised qualification, or one that could be recognised against the types of qualification defined (L2 substantial vocational, L3 academic, AG or TL) then attainment should be recognised.

Completion would be more difficult to report, given that one of the approaches supported by MOOCs is for study in a timeframe appropriate for the students and the course – so not all might achieve the qualification within the two years of this phase of education.

There are many issues raised by this question; it is probably too early and this is not the right place to start to address them all.

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:

The consultation is an extremely important one and it has been impossible to use the structure provided to give our views. For this reason we have appended a full paper following this question.

Measuring what matters

Pearson's recommendations on accountability 16-19

An accountability system that will encourage excellence, be simple to understand, and improve life chances for students aged 16-19

Summary

Pearson very much welcomes the direction of these proposals. We think the key to success lies in ensuring that the interests of the institution align completely with those of the student and reflect Government policy objectives. We agree with many of the proposals but in some cases suggest that there may be better ways of achieving the objectives.

Layer information for greater impact

The proposals are, however, overly complex and there is a danger that this desire for comprehensively reporting the many aspects of provision at this level may be confusing. Detail can still be available but more carefully layered and structured to improve access.

Focus on progress and destination data to measure what matters for students

We recommend that as soon as possible the headline measures for all categories of provision post-16, to which minimum standards apply, are based on progress. Destination data is also important and should be made available wherever possible – but not used for accountability measures. Thus:

	Main headline measure for Government & student information		Deeper information for all – easily available via DfE or institution websites
	<i>Sharper accountability headline measure – minimum standards</i>	<i>Better information on destinations</i>	<i>Additional performance Indicators – to include:</i>
Level 2	<i>Progress</i> VA from end KS4 to L2 VA in L2 Maths & English	Destination data - Further study and employment	Completion; absolute attainment in L2 recognised quals and in L2M+E attainment; closing the gap; traineeships
Academic	<i>Progress</i> VA from L2 to L3 in academic qualifications	Destination data - Further study and employment	AL Subject VA scores; Ave grade best 3 A levels; completion measures; AAB in 2 facilitating subjects; closing the gap; L3 Maths attainment
Applied General	<i>Progress</i> VA from L2 to L3 in AG qualifications	Destination data - Further study and employment	AG subject VA scores; completion measures; closing the gap
Technical Level	<i>Progress</i> VA from L2 to L3 in TL qualifications (as soon as possible)	Destination data - Further study and employment	Specialist subject VA scores; completion measures; closing the gap

A wide range of other measures, including those proposed, should also be made available, but we recommend that the focus of attention should be on headline progress measures and that it is on these that minimum standards should be set - these are what students want to know and they lie at the heart of the Government's policy objectives. Beyond these headline measures there are differences between the data that will allow for sharper accountability and the data that will provide clear and reliable information for students and parents. We therefore recommend that beneath this level there should be the opportunity for all those with an interest, particularly prospective

students and their advisers, to interrogate the headline measures in a variety of ways that will allow them to find the most useful information for their particular needs or interest.

Use a coherent model of accountability from 5-19 for better public understanding

Finally, we suggest that having a coherent model of accountability across the 'trilogy' of accountability – that is Primary, Secondary and 16-19 provision – all based on clear and comprehensible progress metrics – would have real benefits. It gives a coherent message that what matters – and is therefore measured – is the progress of the student across the full 5-19 phase.

This paper sits alongside the response to the consultation which we have submitted on the designated form, and highlights our key recommendations.

Vision and aims

Pearson fully supports the three declared aims in the consultation, of sharper accountability to raise standards, clear and reliable information for students, and incentives to deliver English and mathematics to those who have not yet achieved a grade C. This paper looks at each of the three aims and makes recommendations about how these could be best achieved.

Aim 1: Sharper accountability to raise standards

The power of 'progress' measures

We know from the way that KS4 and Primary accountability measures drive behaviour in schools that the floor standards are the things that make the difference. This approach to minimum standards will be new to this sector and at the moment there is relatively low recognition of 16-19 performance tables. Factors such as funding have been far more influential in driving behaviour – and often not in the best interests of students. But in the long run, the introduction of minimum standards will have far and away the greatest impact on behaviour in the sector – and it is important that there is complete alignment between the minimum standard and the interests of the student.

The consultation proposes to use progress as the key measure for academic and applied general qualifications. We agree with this completely and understand how that will give a sharper focus to reporting the performance of schools, colleges and other providers. We think the proposed way of calculating and showing progress is broadly correct because it is statistically sound, easy to understand and useful for comparative purposes, although there are some issues to resolve around the grade scales that are used to report achievement above or below national averages.

Level 2 qualifications

Recommendation 1: *The level 2 qualifications which are reported on in the measures must support progression to further study as well as to employment*

Pearson welcomes the introduction of reporting of achievement at level 2 and below, as this is a key part of the provision for this age group. While many students have achieved well at level 2 by the end of KS4 and are ready to move on to study at L3, a significant minority needs more time to reach this standard – and the changing demands of the economy mean that it is important that all students are encouraged and given the opportunity to reach the highest levels they can. The reasons for under-achievement at KS4 are many and varied, and post-16 provision at L2 and below needs to reflect this.

We are very concerned, therefore, that the proposals suggest that the only qualification achievement to be reported is of 'substantial vocational qualifications ... which provide the knowledge and skills necessary to enter a particular trade or skilled occupation e.g. plumbing.' These qualifications will undoubtedly meet the needs of some students whose aspiration is to take a different type of course from the one they followed at KS4, and who wish to progress directly to employment. However there is a diminishing range of employment opportunities for those with level 2 qualifications and it seems perverse to incentivise providers to focus on this route.

We believe – and have the evidence – that a great many of the students who have not achieved sufficiently at level 2 by the age of 16 have the capacity to do so given a bit of extra time, and having achieved at level 2 have the motivation and ability to continue with study at a higher level. Each year Pearson registers around 100,000 students aged 16 onto BTEC level 2 programmes, and we can track those students who continue to study with us. We know that around 35% of those students go on to start a BTEC level 3 programme aged 17, and of those typically a third go on to higher education courses, albeit a little later than those who took the direct route through from KS4. These are just the numbers that follow a BTEC route through from level 2 to level 3 – it does not take into account those who follow a similar route using different qualifications.

The characteristics that will define 'high quality level 2 qualifications' for this age group must therefore be specified very carefully. We believe that the qualifications should encourage achievement that will lead the student to want to continue in further study or training at a higher level. Likely progression routes would be to level 3 qualifications with a track record of preparing students for higher education, or to apprenticeships. Qualifications that prepare students for 'level 2 jobs' are worthwhile as well, but accountability measures should not be doing anything that suggests that completing with level 2 achievement is the sole aim.

The list of high quality level 2 (and below) qualifications should start with those already recognised for KS4. These will go a long way to meeting the needs of those students

who wish to complete their level 2 study and progress to similar study at level 3. For some it could be a fresh start studying one or more new subjects – perhaps alongside English and mathematics – while for others it could be continuing to study in greater depth a sector they were introduced to at KS4.

The list will need to be extended to add in qualifications that develop more specialist skills and can lead directly to the workplace, and these additional qualifications should have the support of employers through their direct involvement in development – at the very least – and potentially in their delivery too.

Level 2 progress

Recommendation 2: *The best measure for headline reporting at level 2 is Progress, not a combined 'attainment and completion' metric.*

We believe the combined 'attainment and completion' metric is not helpful, as a report combining the two in the end tells us nothing clearly about either. We challenge the suggestion that progress cannot also be used for L2 achievement. We recognise that in the short term the relative lack of graded qualifications at level 2 makes it harder to judge progress and achieve reliable correlations, but that should change once the makeup of the 'approved' list is known and as new qualifications are introduced over the next two years. We recommend as a first step that the correlation between KS4 performance and current graded level 2 qualifications is investigated, to test what difference this will make. In the short term, achievement in mathematics and English could be reported in terms of progress as well as absolute attainment.

Students start their post-16 course with a measure of their achievement at KS4. It should be possible to report, using the same points methodology, all the additional achievement the student makes at level 2 post 16. This would provide raw attainment data as a starting point for calculating progress. Please refer to Appendix 1 of this report for further discussion of this approach.

Level 3

Recommendation 3a: *The best measure for headline reporting of Technical Level achievement is Progress, not a combined 'attainment and completion' metric, and this should be the declared intention, with a target date of 2018 results for implementation*

Recommendation 3b: *In the short term, attainment and completion should both be reported, but separately*

We challenge the suggestion that progress cannot also be used for L3 technical qualifications. We think it should be possible to apply this measure to these qualifications as well, which will give a unified structure that will be clear, consistent and comprehensible. The correlation between KS4 performance and achievement in

Technical Level qualifications has been shown to be low in work done to date, but at this stage the make-up of the Technical Level list of qualifications is not known, and once redeveloped for 2016 their characteristics are likely to be different in significant ways, and so we feel it is too early to say that progress cannot be used for this suite.

As with level 2, the combined 'attainment and completion' measure will obscure the actual details of each individual measure and so we would question the 'sharpness' of using it as a headline reporting measure. We accept that there is a problem of reporting progress when a significant proportion of interim Technical level qualifications will be ungraded. However this will change when the new qualifications come in for first teaching in 2016, and work should be undertaken with the declared intention to report progress from their first results in 2018. In the short term, attainment and completion should be reported distinctly from each other.

Levels 2 and 3

Recommendation 4: *All achievement across this phase of education / training should be reported in performance measures. Reporting should not be restricted to the highest level of achievement, nor reported at a set post-18 census point*

The post-16 phase of study is characterised by a wide variety of students following a number of different routes, and not all at the same pace. The different routes are largely addressed with the four different categories of qualification (level 2 and below, Academic, Applied General and Technical Level) but the issue of pace is critical. Many students will have planned programmes that do not fit neatly into the concept of a 'two-year' phase; for example the student who needs one year to complete their level 2 studies before starting a two-year level 3 programme. If a true picture of the provider is to be given, and accountability is to be truly 'sharp', all the achievement that this student makes should be captured in these performance measures, both the level 2 achievement at the end of the first year and the level 3 achievement at the end of the third year. Not reporting all of this achievement would give only a partial picture of the school or college's performance.

Aim 2: Clear and reliable information for students

Students make important choices at 16 – where to further their study, whether to continue with academic study or to start moving towards employment, and above all, which institution or provider to go to to get the best support and teaching, the best chance of better grades, and the best chance of fulfilling their ultimate ambitions.

A good FE college, a good school or sixth form college, a good training provider will already have the student's interests at heart – and will welcome measures that align

with these aspirations and enable them to act in the ways they know that will help their students most.

Two key measures: Progress and Destinations

There are essentially two key things that a student needs to know about an institution. We believe that to achieve the second aim, first and foremost the focus of the new accountability measures should be to report on them.

1. Progress: which institution will help me do the best that I can in my studies?

Whether they want to do A levels, take a vocational qualification, or acquire key literacy and numeracy qualifications they missed at KS4, students should be able to compare in a simple and straightforward way the progress they are likely to make in each of the institutions accessible to them.

Recommendation 5: Minimum standards based on progress should be the key metric

This recommendation, in support of the aim to provide clear information for students, is consistent with achieving the first aim of sharper accountability.

2. Destinations: which institution is likely to do the best job at helping me get where I want to go?

What have the various institutions available actually managed to do for their students? Have they been more or less successful than comparable institutions in getting students into higher study or into employment?

Recommendation 6: Destination data by segment should be equally available to students but should not be a part of minimum standards

The value of destination data to students

The second key piece of information a student should have access to is destination data – “If I go to this institution, how successful is it at helping me get to where I want to go?” Whether they are intending to go on to further study or into employment, having a clear sense of the success of the institution in helping them achieve their goal is an important additional piece of information. It is important that this information is presented in a consistent format so that comparisons between institutions are easily made.

Overcoming the difficulties in providing destination data

We recognise the difficulties that currently exist in establishing consistent and comprehensive destination data. There are also difficulties in making the data truly

comparative, given regional economic differences, for example, but this does not mean that there should not be a requirement to display this where it exists – and that there should be a determination to move towards making this data available in the future. Current moves to allow the use of National Insurance data to track progression on a more accurate basis would be helpful if the various data protection issues can be resolved.

The value lies in the comparability of the data

The most important use of this data is that it enables the student, and others, to compare the performance of one local institution with another. It is not an absolute measure nor is it used as a minimum standard – so local comparability is the most important factor. Given the national variability in local employment opportunities it would not be appropriate to make comparisons at a national scale. To some extent, this also resolves the problems of sourcing destination data – whatever data is available locally can be used – but should be done on a consistent basis for all comparable institutions.

Simple questions are often more complex in the detail, but that does not mean we should lose sight of the key questions. We also know from the impact that accountability measures have in schools that it is the floor standards – here minimum standards – that are the most powerful drivers of institutional behaviour. So whilst it may be difficult to devise measures that answer these questions at the moment, we should still hold to these two clear principles.

Recommendation 7: *The focus of reporting should be the data used for minimum standards and the destination data, but there should be easy access for those interested to interrogate the detail below these published measures*

In order to meet the second aim of providing clear and reliable information for students and parents, they should be able to access the information that will be most relevant to their purpose. Reporting a large amount of diverse data risks being confusing; making available on request the same (and more) data can be used by individuals to add clarity.

For some this will be to look at the progress measures by subject, for example digging below the institutional headline measure of ‘progress in Applied General qualifications’ to see what it means for the subjects they intend to take. The same information should be available for the other lower level, Academic and Technical Level categories.

For others, they will want to look beneath the ‘progress in academic qualifications’ headline to see what it means for a 3 A level programme or for the facilitating subjects in particular. We therefore support the provision of more data about performance than is proposed in the two Annexes to the consultation, but believe a full range should be

easily available on demand rather than a smaller number of selected data sets be emphasised.

In order to give proper comparisons, we also believe that this additional data – which would be available in helpful and appropriate ways for all categories – should be based wherever possible on progress rather than absolute attainment.

Aim 3: Incentivise the delivery of English and mathematics to those who have not achieved at KS4

Recommendation 8: *Alongside the value that GCSE represents, allow the development of alternative assessment and certification models that will deliver high standards of appropriate vocational literacy and numeracy, gain employer respect and engage and motivate students.*

Current and new GCSEs in mathematics and English set high standards that should be aspired to and available to all pre-16. The reforms in progress are aimed at ensuring that this will be the case. But the evidence is that for some students, these qualifications do not and will not meet their aspirations or needs in employment. There are widespread and publicly voiced concerns that GCSE mathematics and English may not be the best proxy for post-16 literacy and numeracy. Other models exist that could be used including existing functional skills, mathematics and English embedded in vocational qualifications, and free-standing alternative qualifications such as FSMQs. The involvement of employers in the development of these qualifications will further enhance their acceptability and attraction.

It is critical that employers and the public understand the value of such qualifications – whether stand alone or embedded – in the way that they understand qualifications that use the GCSE ‘brand’. One possible way of resolving this might be to use a GCSE ‘brand extension’ – so perhaps an ‘Applied GCSE in...’ Such a qualification should have its entry restricted to those over 16.

Recommendation 9: *Achievement in English and mathematics should be incorporated into the level 2 headline measure and double weighted to emphasise their importance*

All students without level 2 in Maths and English post 16 are required to be working towards a level 2 qualification in these subjects. Achievement in these subjects has been shown to be of critical importance in improving life chances for students, and so rather than just being an ‘Additional proposed measure’ we argue strongly that this should either be reported as a required minimum standard – or combined into the single headline measure at level 2 with a double points weighting (as at KS4). (A proposal for achieving this is set out in Appendix 1.)

Appendix 1 – measuring progress for post-16 L2 qualifications and L3 TL qualifications for minimum standards

The consultation raises a number of important questions relating to the accountability measures that might be used for the delivery of post-16 level 2 qualifications and for Technical Level qualifications.

We feel that these are extremely important areas that it is essential to get right and that the measures and the characteristics of the qualifications should take due account of the needs of students. This means that they should focus on the progress the institution will help students make and the progression options that become available to them.

This appendix demonstrates how it is possible to move towards four key recommendations:

Recommendation 2: *The best measure for headline reporting at level 2 is Progress, not a combined 'attainment and completion' metric*

Recommendation 3a: *The best measure for headline reporting of Technical Level achievement is Progress, not a combined 'attainment and completion' metric, and this should be the declared intention, with a target date of 2018 results for implementation*

Recommendation 4: *All achievement across this phase of education / training should be reported in performance measures. It should not be restricted to the highest level of achievement, nor reported at a set post-18 census point*

Recommendation 9: *Achievement in English and mathematics should be incorporated into the level 2 headline measure and double weighted to emphasise their importance*

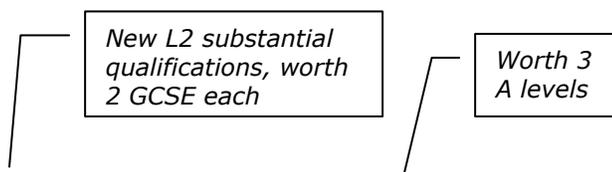
Measuring attainment and progress to other level 2 qualifications and then on to level 3 qualifications at 19

There is a perceived difficulty in measuring progress when a student moves from an academic course at school to a vocational track at 16+ where perhaps other level 2 qualifications are taken together with on-going additional mathematics and English to achieve GCSE. The student may then perhaps move to a level 3 course at age 17 which is then completed at age 19 (and so would fall out of the current arrangements).

We suggest that it should be possible to use an adaptation of the KS4 underlying points progress score (perhaps expressed as a grades gained figure) using a similar basket of up to 8 best subjects – but without the structure of the 'slots' used at KS4 to allow the greater focus on substantial vocational qualifications that are appropriate for students on this pathway and at this level of maturity. Achievement at 16 should be the base line for measuring the initial progress made. Just as students on a mixed level 3

programme taking 2 A levels and an Applied General qualification will have two of their results reported under the 'Academic' measure and one under the 'Applied General' measure, so the student taking a mix of level 2 and level 3 qualifications across this stage should have their level 2 results included in the 'level 2' measure, and their level 3 results reported under the appropriate academic or vocational measure.

This is best seen as a diagram:



1. Level 1 achievement at KS4	2. 1-year L2	3. 2-year L3
GCSE 1 - D	L2SQ - M = 2 x 2 x 46 = 184	L3 qual - DDD = 3 x 225 = 675
GCSE 2 - D = 3 x 34 = 102	L2SQ - M	
GCSE 3 - D	GCSE English - C = 2 x 2 x 40 = 160	
GCSE English - D 2 x 2 x 34 = 136	GCSE Maths - C	
GCSE Maths - D		
Total points at start of programme 102 + 136 = 238	New points total 102 + 184 + 160 = 446 Value add = 446-238 = 208	New points total 446 + 675 = 1121 Value add = 1121-238 = 883

(Points are based on the current performance table values)

Box 1 shows the level 1 achievement a student brings with them from KS4

Box 2 shows the gains in achievement made at Level 2

Box 3 shows the further gains in achievement made to level 3

Calculating a combined attainment gain

In the above example, a student arrives with **238** points at KS4. They take further Level 2 qualifications and, having achieved a Merit in both, receive **184** additional level 2 points. They also retake their English and mathematics and achieve a grade higher in both. As these two subjects are double weighted, they total to **160** points together. Their new points total is $102 + 184 + 160 = \mathbf{446}$ points. Therefore, the value added by the institution is $446 - 238 = \mathbf{208}$ points.

This student then goes on to achieve DDD in a Level 3 qualification, equivalent to 3 A levels, which gives them $3 \times 225 = \mathbf{675}$ points. Their new points total becomes $446 + 675 = \mathbf{1121}$, and the value added by the institution is $1121 - 238 = \mathbf{883}$ points.

Reporting the interim L2 achievement separately would show the achievement of all students on L2 programmes, whether they took one, two or three years to complete it.

Turning the attainment gain into a progress measure

The low correlation currently identified between KS4 results and subsequent achievement in level 2 and Technical Level qualifications means that it may not be possible yet to create a progress measure for all these qualifications. However a first and immediate step should be the recognition of additional level 2 achievement by those en route to level 3 study as well as those for whom level 2 is the highest study aim.

Alongside this, an urgent programme of work should be undertaken to fully understand the reasons why correlation is currently low. Once it is known what the future level 2 and Technical Level qualifications will look like it should then be possible to model the impact changes to qualifications will have on this correlation.