



Department
for Education

Consultation on the reform of Level 3 Vocational Qualifications for 16-19 year olds

Government response

July 2013

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Introduction

On 7 March 2013 the Department for Education launched a public consultation on reforming Level 3 vocational qualifications for 16-19 year-olds in full time education.

High quality vocational education is essential to future economic growth and ensures that we make the most of every young person's talents and abilities. Building on the Government's reform of vocational qualifications for 14-16 year olds, the consultation set out proposals to ensure that only advanced vocational qualifications that are proven to provide progression to further learning or employment count in future 16-18 School and College Performance Tables.

The consultation sought views on plans to introduce three separate categories of qualification – Occupational, Applied General and Academic qualifications. It proposed that to continue to be reported in performance tables, qualifications would need to demonstrate pre-defined characteristics and that these should be as rigorous as the requirements set for academic qualifications.

The consultation posed questions on:

- the purpose and definition of each of the two proposed vocational categories;
- the involvement of employers in the delivery and assessment of Occupational qualifications;
- the level of external assessment for Applied General qualifications;
- the recognition of qualifications by higher education institutions;
- the potential impact of the reforms on Advanced Apprenticeships;
- funding arrangements for post-18 learners, and;
- when any reforms should be implemented.

The consultation closed on 10 May. A total of 184 responses were received, 173 from organisations including schools and colleges, universities, employers, professional bodies and other sectoral representatives, awarding organisations, unions and professional associations, and 11 individual responses. Six workshops and a series of meetings with stakeholders were held in March, April and May to consider the options proposed within the consultation in more detail. Respondents are listed in Annex A.

Summary of responses

The majority of respondents supported the following proposals:

1. Vocational education should be treated as a valued alternative to academic study.
2. Dividing Level 3 qualifications into three categories i.e. academic and two vocational categories will provide more clarity for prospective students.
3. Vocational qualifications should be required to meet a range of pre-defined characteristics to be included in future performance tables e.g. employer endorsement, external and synoptic assessment, grading, a minimum size requirement.
4. Awarding organisations should be given a two year 'grace' period to redevelop qualifications to meet the full standard.
5. Where appropriate, the Skills Funding Agency should be able to fund learners over the age of 18 to take vocational qualifications that are 'approved' through this process.

There were also a number of suggestions and potential risks:

1. Student choice could be narrowed if qualification categories were too restrictive.
2. The use of term 'occupational' could be interpreted as restricting students to a single occupation/ job role.
3. Qualifications specified for a particular Advanced Apprenticeship programme could be changed or withdrawn as a result of the reforms.
4. There are practical difficulties in assessing the proposed 'appropriate content' characteristic, given the highly technical nature of many qualifications.
5. The term 'employer endorsement' should be more clearly defined if it was going to influence practice.
6. University recognition of vocational qualifications should be included as a condition of qualification approval. Increasing numbers of students use vocational qualifications to secure a university place.

Responses by Question

Q1: Do the three categories of qualifications reflect the diversity of qualifications and study aims for the 16-19 cohort?					
YES	57%	NO	25%	NOT SURE	18%

The majority of respondents welcomed the proposal of three categories of qualification and felt the proposed categories covered the full range of different students' study aims. Those respondents that disagreed, including a number of awarding organisations, believed that some qualifications could 'sit' in either of the proposed vocational categories, or both. One such body stated, *"Whilst the three categories probably address most study aims, many qualifications have proved their value in enabling positive progression and display characteristics that cut across the boundaries imposed by the three-way division."*

A number of respondents suggested that some characteristics should apply to all qualification categories suggesting that, *"stretching core content, key enabling skills and rigorous examinations should apply to all academic and vocational qualifications."*

A number of respondents wanted to avoid students embarking on qualifications at 16 which would 'close down' future opportunities for progression including the possibility of going to university. They suggested that the education system needs to be flexible enough to recognise and support the fact that young peoples' career and further learning aspirations often change between the ages of 16 and 19.

To respond to concerns that Occupational qualifications were too tightly defined, this definition has been revised to cover qualifications which equip a student with specialist knowledge and skills relating to an occupation or occupational group.

The term 'occupation or occupational group' will be referenced by Standard Occupational Classification (SOC) coding¹, where 4-digit SOC codes relate to recognised and specific job titles e.g. laboratory technician and 3-digit SOC codes relate to the broader 'minor group' that these job titles fit within e.g. Science, Engineering and Production Technicians.

Both categories of qualifications will also have more characteristics in common than were originally proposed.

¹ For more information visit <http://www.ons.gov.uk/ons/guide-method/classifications/current-standard-classifications/soc2010/index.html>

Q2: Are there examples of vocational qualifications which cannot be effectively categorised in this way?					
YES	38%	NO	35%	NOT SURE	27%

Several awarding organisations which responded to the consultation felt that some qualifications may be difficult to categorise because they “achieve a multitude of purposes” and can support a range of pathways.

Others felt that existing types of qualification, and the programmes students choose to follow, could fall into both categories, “Parts of some qualifications such as BTecs, City and Guilds, HNCs and HNDs might cover two or more of the categories”.

To remove potential confusion about the intended purpose of a qualification, awarding organisations will be required to clearly define, and subsequently redevelop, existing qualifications as either Occupational or Applied General qualifications.

Q3: How would these reforms impact on current Apprenticeship frameworks?

Most respondents concluded that qualifications taken as part of an Advanced Apprenticeship would typically fall within the ‘occupational’ category. A number of respondents felt that until plans for the implementation of the Richard Review had been finalised it was too early to be sure how the Department’s proposals would affect Apprenticeship frameworks: “It is difficult to comment on how the proposed changes to 16-19 qualifications will impact on an Apprenticeship programme, which is offered to a wider age group and which is currently in a state of some flux.”

The Department for Education and Department for Business, Innovation & Skills jointly manage the Apprenticeship programme under one joint Minister. The two Departments will continue to work together to ensure the 16-19 vocational qualification and the Apprenticeship qualification reforms are complementary.

Q4: Do you agree the new categories of qualification should be called Academic, Occupational and Applied General?			
Academic 10%	Occupational 10%	Applied General 7%	Unsure 73%

Most respondents were unsure about the names that had been proposed although their comments were closely linked to concerns about the intended purpose of the qualifications (see above). A number of alternative names were proposed for Occupational qualifications. These included ‘professional qualifications’ or ‘technical qualifications’. Other respondents suggested that Applied General qualifications could be simplified to ‘applied qualifications’.

The term Occupational will not be used and the term Technical Level or ‘Tech Level’ qualifications adopted instead. This reflects the fact that these Level 3 qualifications will feature as one of the three components of the new Technical Baccalaureate performance table measure. Because ‘professional’ qualifications are generally awarded by professional bodies this name was not adopted. The term ‘Occupational’ is used throughout this document because it was the name for this type of qualifications used within the consultation.

The original proposed category name Applied General will be adopted as proposed. The use of the term ‘general’, also applies to qualifications such as A levels, so the term ‘applied’ serves to differentiate them from ‘academic’ qualifications and the term ‘general’ from the more specialist Occupational qualifications.

Q5: Do awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required for Applied General and Occupational qualifications?					
YES	81%	NO	10%	NOT SURE	9%

There was strong support across all respondent groups for granting awarding organisations a two year ‘grace’ period to redevelop qualifications to meet the full standard. A small number of respondents favoured a shorter grace period. One awarding organisation suggested that the option to submit qualifications for consideration against the full characteristics a year earlier should also be made available.

In response the Department will allow the proposed two year grace period and provide the option for awarding organisations to submit qualifications for consideration against the full characteristics after one year, so by September 2014, for first teaching in September 2015.

Q6: Do you agree with these standards for Applied General qualifications?					
YES	50%	NO	24%	NOT SURE	26%

There was consistent support for the proposed characteristics from a wide range of education institutions. A number of respondents also suggested that each qualification should have a clearly-stated purpose. They felt this would make it easier for students to understand the potential pathways for progression into employment or further study that each qualification offered. Some respondents - particularly awarding organisations – felt that providing evidence for some of the characteristics would be too onerous, in particular the ‘appropriate content’ characteristic.

In response, the ‘appropriate content’ characteristic will be replaced with a ‘declared purpose’ characteristic which requires awarding organisations to set out an unambiguous high level statement of the qualification’s purpose. This should be expressed in uncomplicated terms that students, parents and employers will understand. Awarding organisations will be required to substantiate their statement of purpose.

Q7: What is the minimum proportion of the content of an Applied General qualification that should be subject to external assessment?

The number of respondents that supported different percentages of external assessments was as follows:

%	0	5	10	15	20	25	30	33	40	50	60	100	Varies
Votes	1	2	9	2	13	6	2	3	4	7	3	2	10

One half of all respondents that expressed a preference felt at least 25% of the content of an Applied General qualification should be externally assessed. Nearly three quarters of respondents wanted at least 20% to be externally assessed. Others suggested that the proportion of external assessment for highly practical nature of some subjects such as art and design should vary based on the subject matter.

Most respondents to the consultation supported the Department’s commitment to the rigorous assessment of all qualifications. The balance of knowledge and skills-based content will vary depending on the type of qualification and its purpose. For Applied General qualifications, the majority of the content should be knowledge-based whereas Occupational qualifications will also have a strong focus on skills development. The assessment approach needs to reflect this.

In future, for both Applied General and Occupational qualifications, we expect:

- **all knowledge-based content to be subject to external assessment**
- **all internal assessments of skilled-based content to be subject to external moderation**

Exceptions will be considered on a case-by-case basis for a small number of qualifications. Awarding organisations will need to provide a clear rationale for any exemption and clearly explain how achievement will be assessed and what, if any, proportion of external assessment will still be incorporated.

Q8: How can we best judge whether a qualification is valued by Higher Education Institutions?

Most respondents suggested that Higher Education Institutions should be asked. Several respondents, including those within or representing the university sector, commented that whilst A levels remain the predominant qualification used by UK learners to enter higher education, vocational qualifications, or a combination of vocational and academic qualifications, are increasingly being used for the same purpose.

We will extend the ‘recognition’ characteristic to provide the opportunity for awarding organisations to demonstrate university recognition of both Applied General and Occupational qualifications.

Q9a: Do you agree with the standards for Occupational qualifications?					
YES	45%	NO	24%	NOT SURE	31%

Some respondents were concerned that the proposed Occupational qualification definition would result in qualifications that are overly focused on preparation for a single job role at the expense of transferable skills within a wider occupational area.

Ofsted suggested that Occupational qualifications should be restricted to young people who had been able to secure an Apprenticeship. However they did accept the practical difficulties in doing this. Given that all apprentices need to be employed their proposal would mean that young people who had not already secured a job would be unable to study for an Occupational qualification. A number of respondents also proposed that work experience should be a mandatory requirement of occupational qualifications.

Other respondents argued that Occupational qualifications should be graded. One employer body said, *“Competent does not necessarily mean mastery, so this is where a grading within ‘occupational’ qualifications could make a real difference.”* Similar views were expressed by employer bodies at stakeholder meetings.

The Department believes that young people should be able to study Occupational qualifications as a full-time student as well as part of an Apprenticeship. Whilst it is sympathetic to the requirement that work experience should become a requirement of Occupational qualifications, it also recognises that there are some qualifications, and types of training, which do not lend themselves to work-based provision. However the inclusion of work experience as an integral part of Occupational qualifications will be one of the main ways to demonstrate local employer engagement in the design, delivery and assessment of qualifications.

In response to comments on the grading characteristic, Occupational qualifications will need to be graded.

In exceptional circumstances, the DfE will consider delays in the introduction of grading for Occupational qualifications leading to a licence to practise if the awarding organisation provides a strong justification for this e.g. the need for more time to agree a suitable grading regime with employers.

Q9b: Can Occupational qualification characteristics be applied across any sector or local area?					
YES	40%	NO	20%	NOT SURE	40%

Very few written responses were received in relation to this question.

Q10: How can awarding organisations support providers in engaging local employers in delivering and assessing qualifications on the ground?

This was an open question seeking respondent's views and comments. The vast majority of respondents supported greater local involvement of employers in the delivery of qualifications. However many made the point that not all firms will have the time to be involved in design, delivery and assessment.

Several education providers commented on the need to develop new 'time-efficient' ways of engaging employers in the delivery and assessment of qualifications, and that employer organisations such as Chambers of Commerce, the Federation of Small Business could play a role.

Typical comments included: *"Awarding organisations can support providers by offering a qualification that is flexible enough to meet the needs of and engage with employers and be assessed effectively for the local labour and skills market. However, as previously mentioned, it's unlikely that SME's and micro-businesses will be able to resource delivery and assessment"*.

"Business involvement should go beyond endorsement and extend to curriculum design, delivery and assessment."

Awarding organisations will have two years to redevelop Occupational qualifications to include clear expectations of local employer involvement. These changes will be supported by the reform of 16-19 funding and the planned expansion of post-16 work experience which is taking place from September 2013. This will make it easier for schools and colleges to develop, and invest in, closer links with local employers where these do not already exist. The Department will also consider how effective practice in involving local employers in the design, delivery and assessment of vocational qualifications can be identified and shared.

Q11: What evidence should we require of provider engagement with local employers in the delivery and assessment of Occupational qualifications?

Some respondents described successful joint working between local employers, providers and awarding organisations. Others expressed concern that employer involvement in assessment could result in inconsistency in awarding qualifications and grades.

Employer representative bodies all expressed a desire for greater involvement, *"a strong appetite to engage, as long as government and awarding organisations are clear on expectations and bureaucracy is kept to a minimum...Assessment should be consistent and simple so that employers can effectively contribute and engage."*

Q12: Should the Skills Funding Agency approve the funding of Occupational qualifications (irrespective of whether they are on the Qualification and Credit Framework) if a learner is over the age of 18 and under 25 and entitled to funding under the terms of the Adult Entitlement to Learning?					
YES	83%	NO	5%	NOT SURE	12%

Most respondents warmly welcomed the proposals, one pointing out, “*young people do not conveniently reach a particular stage in their education and training on their 19th birthday.*”

Another stated, “*In niche technical areas like Data Science / Analytics an employer will be seeking a candidate with excellent communication and maturity; having funding extended to 25 years old will only enhance the employability.*”

This proposal will be considered in the light of forthcoming decisions on Government spending.

Q13: Should the Skills Funding Agency consider funding certain Applied General Qualifications in the same way? If so, what criteria should be used to identify these?					
YES	75%	NO	6%	NOT SURE	19%

Most respondents firmly endorsed the principle that a young person’s learning should not be interrupted when they turn 19 for reasons of funding.

Criteria will be considered in more detail as part of the Skills Funding Agency’s continuing review of policy on the scope of government funding for learners who are over 19.

Next steps

1. Full details of the Government's response are contained in the Technical Guidance that accompanies this summary of the consultation responses.
2. The two vocational qualification categories have been re-defined to more accurately reflect their purpose, and the same interim requirements now apply to both categories of qualification.
3. The Department plans to publish the list of qualifications which meet the interim requirement and will be taught from September 2014 in November 2013. This will give education providers sufficient time to plan for these changes. Qualifications which meet the interim characteristics will then be reported in the 2016 performance tables.
4. The Department will also publish experimental data in 2014, to show institutions how their 2013 performance table results would have been affected if only the qualifications which meet the interim requirement had been reported. This will help education providers assess the likely impact of the changes on their performance table results.
5. Awarding organisations will then have until September 2015 to develop qualifications which meet the full requirement required of Applied General and Occupational qualifications. These qualifications will then be taught from September 2016 and reported in the 2018 performance tables. There will also be the option to submit qualifications for full approval a year early. This means that some qualifications which meet the full requirement will be taught from September 2015.
6. The accountability system for post-16 providers will be considered in a separate consultation. This will include proposals concerning how Applied General and Occupational qualifications will be reported in 16-18 performance tables, how performance in each of the three categories of qualification (Academic, Applied General and Occupational) will be measured, and minimum standards.

Annex A: List of organisations that responded to the consultation

There were 184 respondents. The following organisations assented to their responses being publicly acknowledged. There were also responses from eleven individuals.

11-19 Team, Hackney Learning Trust
11-19 Secondary School
The 157 Group
Accrington & Rossendale College
Across
Addey and Stanhope School
The Adult College of Barking and Dagenham
Apprenticeship Ambassadors Network
AQA – Assessment and Qualifications Alliance
Arts Council England
ASDAN – Award Scheme Development and Accreditation Network
Association of Accounting Technicians
Association of Colleges
Association of Employment and Learning Providers
Association of Managers in Education
Association of School and College Leaders
Barking & Dagenham College
Barnsley College
BCS – The British Computer Society - The Chartered Institute for IT
Beal High School
Bishop Ramsey C of E School
Black Country Partnership for Learning
Brent 14-19 Partnership
Bromley College
Burton and South Derbyshire College
Capel Manor College
Cardinal Wiseman School
CBI – Confederation of British Industry
Centrepoint
Chartered Institute for Securities & Investment
Chartered Institute of Building
City and Guilds
City of Liverpool College
City of York Council
Cogent
Cornwall Youth Work Partnership

Crafts Council
Craven College
Creative & Cultural Skills
Creative Skillset
Cultural Learning Alliance, The
Cadet Vocational Qualification Organisation
Devon & Cornwall Training Provider Network Ltd
Devon County Council
Drapers' Academy
e-skills UK
East Riding College
East Riding of Yorkshire Council
Edge Foundation
Emmanuel College Gateshead
Engineering Professors' Council
Farming & Countryside Education
Federation of Awarding Bodies
Friern Barnet School
Field Studies Council
Freedom and Autonomy for Schools – National Association
Garratt Park School
Gatsby Charitable Foundation, The
GL Education Group (Formerly Granada Learning Group)
Guernsey College of Further Education
Guild Higher Education
Halesowen College
Haringey Sixth Form Education Academy
Havering College of Further & Higher Education
The Hereford Academy
Homewood School and Sixth Form Centre
Huddersfield New College
ifs School of Finance – Institute For Fiscal Studies
Improve Ltd
Institute of the Motor Industry, The
John Ruskin College
Kent County Council
King Edward VI College
Lancashire Colleges, The
Landex
Lantra - Sector Skills Council for the environmental and land-based industries
League Football Education
learndirect

Lincoln College
Linking London
London Councils
London Work Based Learning Alliance
Longley Park Sixth Form College
Loreto College
Loughborough College
Luton Sixth Form College
Moulton College
Mulberry 6th Form
National Association of Head Teachers
National Association of Schoolmasters Union of Women Teachers
National Federation of Roofing Contractors
National Foundation for Educational Research
National Skills Academy for Retail
National Union of Students
National Union of Teachers
Association of National Specialist Colleges
NCFE – National Council for Further Education
Newcastle College Corporation
Newham College
Newham Sixth Form College
Newman Roman Catholic College
NFU – National Farmers Union
North Warwickshire and Hinckley College
Novels Consulting Ltd
Ofsted
Our Lady's Convent High School
Oxford Cambridge and RSA Examinations
Paddington Academy
Paget High School
Pearson Education Ltd
Personal Finance Education Group
PLASA – Professional Lighting and Sound Association
Plumstead Manor School
Professional Association for Childcare and Early Years
Rotherham Metropolitan Borough Council
Royal Academy of Engineering, The
Runshaw College
Scarborough Sixth Form College
Science Council, The
Scottish Qualifications Authority

Sheffield College
Signature
Sir George Monoux College
Sixth Form Colleges' Association
Skills for Care and Development
Skills for Health
Somerset Employment and Skills Board
St Bede's School
St George's Academy
Staffordshire County Council
Stockley Academy
Supporting Professionalism in Admissions
Surrey County Council
Surrey's Secondary Heads' Phase Council
Taunton Academy
Timely Advice
Trinity College London
Turnford School
Universities and Colleges Admissions Service
Universities UK
University and College Union
University of the Arts London Awarding Body
University of Bedfordshire
University of Sheffield
Usha Martin
Vocational Training Charitable Trust
Wakefield Metropolitan District Council
Waltham Forest College General Further Education
Wandsworth Borough Council
Weston College

Events and Meetings

Awarding organisations workshop	(35 attendees)
Further Education Colleges forum	(25 attendees)
Construction sector representatives meeting	(8 attendees)
Local school and Sixth Form College meeting	(8 attendees)
Further Education & Sixth Form College sector workshop	(20 attendees)
National employers focus group	(20 attendees)
Selection of individual awarding organisation and sector body meetings	



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