



LWBLA Formal Response to Government proposals to reform vocational qualifications for 16-19 year olds Consultation Response Questions

The LWBLA is the representative body for all independent training providers in London with over 130 members. We focus on promoting the take up of work based learning across the education and skills sector. Our membership currently delivers over 80% of all publicly funded apprenticeships in London.

The LWBLA has engaged in a formal consultation process with its members by establishing a working group to discuss the detail of the Government proposals to reform Vocational Qualifications through its Consultation Document. A first draft responding to the questions set out in the Consultation Document was circulated to all members and the AELP for comment. Feedback has been received and incorporated into the response set out below.

Our objective is simple; to support those qualifications that give a person the greatest chance to secure progression into employment or higher education. Our strategy is based reducing the risk of failure: to view these reforms from the perspective of the learner in London who has to participate in an increasingly competitive education offer for 16-19 year olds, recognising what is currently a complex transition into the labour market.

We welcome the opportunity of discussing with Government the detail of our response, and look forward to working with Government, and its Agencies, to make this reform process a success.

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

It is difficult to answer this question in detail because you need to understand how all qualifications and study aims are classified. We believe it is therefore fundamental that the Government works through the detail collaboratively with Awarding Bodies, Ofqual and HEFCE strategically at the outset of this reform process to ensure that these classifications are able to reflect the diversity of qualifications on offer to the 16-19 cohort. We recommend a senior oversight group is established by Government to ensure all parties responsible for making this reform a success are engaged and drive the change process at a strategic level.

The key issue we as Work Based Learning providers wish to 'flag up' is how to recognise how the proposed 'standards' (as set out in the Consultation Document) for each of the categories of qualifications. Do these categories either enable or prevent existing qualifications and study aims from inclusion within a specific category. We assume that a qualification can only appear under one category.



The LWBLA believes that each category should contain qualifications that are capable of the achieving all of the following:

- Credibility with the public and employers,
- High levels of performance outcomes,
- Transparency of funding and accountability, and critically
- Progression into further study and/or employment.

If categories such as Academic are predominantly 'A' levels; Occupational qualifications would include the Technical Certificate or License to practise qualification within an Apprenticeship framework, then we assume that Applied General is everything else. So whilst Academic and Occupational can be very specific in terms of the standards to include or exclude the 'diversity of qualifications' it is the 'catch all' nature of Applied General that has to be able to meet the test of Government scrutiny and public credibility.

Our primary concern in using these categories is that the unintended consequences of using 'Applied General' will be that learners and employers will see this as an inferior branded qualification when compared to Academic or Occupational. If on the other hand the headings are to be used solely for the purposes of making public funding accountable then it may have little relevance in the public eye. What the public will see is the qualification not the aim/ programme. We assume that BTEC's would be classified as Applied General - however when you look at specific BTEC subject qualifications such as languages, ICT, hospitality etc., then how would the public understand this heading when they might consider these qualifications to fit under either academic or occupational by the very nature of the subject and not by the assessment process? This is a critical distinction that the Government should make clear when taking these proposals forward.

Furthermore 'Applied General' appears to be a term used to avoid using other well-known words such as 'vocational' or 'technical' to describe the qualification offer. Our preference would be to rename this heading 'Applied Learning' as so many of the qualifications at Level 3 combine elements of both academic and occupational study such as BTEC's.

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

The key issue for the LWBLA is to seek clarification on the future status and value of the QCF? The personalisation of learning has been a driving principle of the vocational offer for 16-19 year olds over the past 10 years and has been instrumental in the development of the QCF.

We also would wish to avoid the education offer for 16-19 year olds becoming divorced from those aged 19+, as this could become a serious issue for all types of occupational and work based learning qualifications. Employers would not understand how the same job undertaken by people of a different age could end up having to pursue different accredited qualifications based on age alone.



3. How would these reforms impact on current apprenticeship frameworks?

Although the reform of Apprenticeships are being considered as part of the Richard Review process the LWBLA believes that the impact of reforming Level 3 qualifications is potentially significant for the Apprenticeship framework. The following issues have been raised by providers during this period of consultation where we seek clarification from Government:

- It is unclear whether the Government continues to accept the principle of 'competence' and the practise of assessment in the work place as the primary driver for the delivery and achievement of occupational qualifications.
- The key point is that 'occupational' must exclusively mean learning in the workplace as the core activity and not in the classroom.
- The definition and content of an Apprenticeship 'framework' is central to understanding the value it has as a study programme when compared to other study programmes.
- The concept of retaining a framework is strongly supported by the LWBLA as the structure for defining and delivering industry led occupationally recognised qualifications.
- All Apprenticeships frameworks should be rebranded as 'occupational frameworks' funded by Government located within the 'Occupational' category.
- Although Functional Skills in English, Maths, and ICT currently sits within the framework they should be restructured. We believe that English and Maths at Level 3 (and beyond) should be clearly outside of the Apprenticeship framework.

All Level 3 Apprenticeship frameworks should attract UCAS points and have industry recognition. Government should set out in the detail of the policy how it intends to guarantee that pursuing an occupational study programme will have credibility and 'currency' in the eyes of both employers and Higher Education.

Employers are key stakeholders in determining the value, application and content of an occupational study programme. The key risk is how different employers recognise the Apprenticeship framework and the Government led reform process should ensure at all stages that flexibility in design and delivery is at the heart of an employed Apprenticeship.

In particular the following issues should be the subjects of on-going dialogue:

- SME's critically rely on the support and expertise of providers to deliver the occupational Apprenticeship. We advocate a new online Occupational Standard 'toolkit' should be created to help SME's make informed decisions and define their input to the process.
- All SME's employing an Apprentice should sign up to a 'good practise' guide to use occupational qualifications, and



- Where qualifications are a license to practise - all employers should agree to a new code of practise led by the relevant SSC to ensure curriculum development and assessment practise is regularly updated and the qualification is transportable to other employers within the industry.
- The Government should encourage industrial sectors either through the SSC's or UKCES to state the preferred qualification progression routes so that the public and employers in general know what has been recognised within an industry, and the status of pursuing such a study programme.

From the public's perspective the issues raised above would reinforce existing 'use value' and critically generate 'esteem value' in the eyes of both employers and learners. From the Governments perspective it would unify the occupational category of learning to the Apprenticeship framework and secures buy-in from all stakeholders in the process; Awarding Bodies, Providers, Employers and Higher Education.

4. Do you agree the new categories of qualification should be called 'academic' 'occupational' and 'applied general'?

We would prefer to see the heading 'Applied General' amended to 'Applied Learning'. This would be a more accurate reflection of the study programme where so many young people combine this type of qualification with academic 'A' levels.

The Occupational category should be exclusively defined as work based learning and include all qualifications contained within a publicly funded Apprenticeship framework.

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

Yes - a minimum of two years from September 2013 is required. Different industries and occupational sectors have very different organising structures, traditions and expectations.

It should be remembered that this is an imposed review by Government that currently lacks consensus and buy-in from a sufficiently broad range of employers, HE Institutions and providers

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

The issues the LWBLA would focus on are:

- **Grading** - a pass, merit, distinction or more detailed scale is being proposed, which we would support as it is the approach adopted by many existing vocational qualifications such as BTECs which are held in high esteem by employers.
- **Synoptic assessment** – the LWBLA would support this proposal following extensive trials and pilots across different subject areas and qualifications. The



synoptic assessment could take the form of an end-of-course project, an exam or in the case of QCF unit based qualifications, an additional unit that assesses the learners' ability to use all the skills, techniques, knowledge, etc., that they have learnt throughout the programme in an integrated way.

- **Appropriate content** – it is important that these qualifications cover a broad vocational area as well as developing study and employability skills. Employability skills don't seem to feature explicitly in the proposals.
- **Progression** – the LWBLA fully supports the proposal that Awarding Organisations should provide evidence that young people who have completed the qualification have been able to progress to further study and wonder if the requirement should go even further and include evidence of progression into work or on to Apprenticeships as the fundamental test of 'use and esteem' value that underpins the qualifications.

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

Our consultation amongst providers in London revealed a wide range of differing views ranging from a minimum of 20% through to 100% of the qualification being subject to external assessment.

Critically it would depend on the type of external assessment adopted. The primary reservation from providers is that it would significantly increase the cost of delivering the qualification without improving the overall quality and learner experience. Our view is that Ofqual with Awarding Bodies should test and benchmark the proportion of external assessment across a variety of recognised and high performing qualification in different settings and delivery models. A detailed examination of this should be considered with a benchmark for each subject.

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

In theory we believe that all 16-19 year old study programmes funded by Government should be attracting UCAS points. It should be for HEI's to 'opt out' of the study programme and the presumption should be that all vocational programmes merit value irrespective of classification. The HEI should seek approval from Ofqual based on a requirement to consult with the relevant Awarding Body. This would ensure that all study programmes – academic, applied or occupational - would in the eyes of the customer and the learner have value and transparent weighting.

The key risk is that learners and employers may be 'miss-sold' courses and qualifications in good faith by FE providers only to find out subsequently that they are not acceptable to HEI's.

Government can use its influence positively to create a new partnership between HEI's and Employers through the UKCES, to have strategic oversight of all progression outcomes thereby securing value for the taxpayer and individual citizen.



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

In general terms – yes; the key point is whether the new standard accepts the principle of measuring ‘competence’ by means of assessment in the work place is the primary driver and pedagogical method to be used in delivering the qualification and study programme.

It is fundamental to the LWBLA that the role of the employer is already deeply embedded in the delivery of the qualification. The possible tension arises when an employer wants to establish their own bespoke qualification that does not have any wider recognition outside of the organisation. Its transferability relies primarily on the reputation and brand of the organisation rather than the qualification that the person has achieved.

At an industry level there is a growing concern that the SSC’s and the UKCES lack credibility in addressing this issue. We can find no evidence that any SSC or the UKCES has sought views or invited stakeholders, in particular from providers who would have to deliver opt employer specifications, to discuss this Government led review.

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

In theory, yes the standards for occupational areas should be applied consistently across all sectors and localities. The complexity arises in comparing Level 3 qualifications from different subjects and ensuring that publicly they attract the same level of status, use and esteem value. Otherwise, some Level 3 qualifications will be worth more than others – particularly from the point of view of HEI’s and employers.

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

Currently the role of Awarding Bodies directly engaging local employers is highly marginal. No provider was able to offer an example of where the Awarding Body engaged local employers and critically involved the provider. Awarding Bodies only work with the Providers who use the Awarding body, so these arrangements are self-selecting, irrespective of the quality and performance of the Provider. This is a significant issue in FE Colleges in London where the purchasing power of the provider drives the relationship with the Awarding Body.

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

The evidence already exists as Apprenticeships require a person to have employed status. The compliance arrangements through the ILR are robust and auditable. Provider engagement with the employer is a critical issue addressed within the Ofsted inspections. The new FE choices website should be developed to show publicly progression rates across all courses and qualifications locally and nationally allowing benchmarks to be established in a systematic, robust and efficient way.



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

Yes - otherwise it may have profound distortions in the labour market with learners advantaged or disadvantaged parley on grounds of age.

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

Yes independent providers in London agree that the SFA should consider funding certain Applied General qualifications on the basis if the following criteria:

- It enhances and validates progression into HE,
- Where specific industry requires a qualification to comply with the license to practise,
- Where an employer requires this qualification as part of the overall study programme and work experience.
- An unemployed person seeking employment

14. Any further comments?

There are ranges of other issues, which will have a profound effect on the credibility of the Government's strategy to reform Level 3 qualifications. We believe at the LWBLA that contextually they need to be addressed in parallel with this reform process to ensure that the changes to curriculum and accountably are successful. These are set out below:

1. Strategic Coherence and credibility

The current arrangements for overseeing national occupational standards should be reviewed and reformed. The aim should be to directly involve HEI's, Employers, Awarding Bodies and Providers so that there is a collective self managed responsibility to oversee and build the credibility of the new arrangements (this is reflected in our response to Question 1). At present each party is responsible for their 'piece of the jigsaw' but no one looks to have an overall technical responsibility to build the standards and enhance the progression routes.

2. Ensuring a level 'playing field' for funding all level 3 Qualifications

The LWBLA believes that the Government should ensure that the new funding model due to go live in August 2013 is fair, equitably distributed, and fundamentally does not distort the take up of one category of qualification over any other. All three learning categories – Academic, Occupational and Applied should be treated equally for the purposes of distributing public funds so that individual institutions/providers, such as schools, are strategically focused on meeting individual learner need above all other considerations.



3. Progression Risk

Our main concern is one of progression risk. The proposed 'direction of travel' with respect to the reform of Level 3 vocational qualifications is that the Government should be able to radically improve the transparency and accountability of public funding - which qualifications are delivered where, by whom, and what success rates are being achieved. But the risk or the 'weakest link' in the proposed changes is to rely on Academic and employer sentiment to affect any substantive improvement in progression into HE and job outcomes principally from the take up of non academic study programmes. If HE does not recognise study programmes for UCAS entry points then learners will feel they have undertaken courses that are no better than the current arrangements. If employers don't validate and recognise qualifications the learner has made significantly improved their prospects of employment and career entry. In the absence of credible IAG for all 15-16 year olds, schools will have a critical and dominant influence on learner choice and Post -16 destinations. We believe 'progression risk' will remain in the new arrangements unless there is clear accountability for the measurement of onward progression for all learners irrespective of the institution and provider they study with during the 16-19 phase. London has a very serious problem of youth unemployment for those young adults with vocational qualifications aged 19 unable to progress into higher education or secure career entry employment.

4. LEP Area Standard Performance Reports

We would welcome the Government publishing, by LEP area, the take up of qualifications under the new headings showing clearly the % and total volume of starts, drop outs, outcome achievements and progression rates into Higher Education and Employment. This should be shown by provider and Borough and linked to the FE Choices website, generating a single source of statistical reference for evaluation purposes. We would welcome a particular focus on long term/ longitudinal measurement to build a clear comparative analysis of the three learning categories. Given the scale of youth unemployment in London it is a critical issue to be able to strategically evaluate how each of the three learning categories makes the greatest contribution to career entry and progression as part of a competitive labour market.

5. Informing Learner Choice

The LWBLA is concerned that the level of careers information advice and guidance available for 16-19 year olds in London is inadequate. Most Connexions style careers services either no longer exist or operate with a radically reduced capacity. Public policy has failed Londoners, particularly those at risk of NEET. London has over 350 state secondary schools with a growing number increasing their sixth form provision, increasingly focused on building a stronger academic offer. The LWBLA is concerned that Applied General and Occupational qualifications will be seen as 'second class' options which indirectly undermines the objectivity of Government policy and the spirit of this review, and the earlier work of Alison Wolf. We call on the Government to radically review the IAG offer for London's 16-19 year olds positioning all three categories of learning as of equal status and value.



6. Evidence of the learner's views

We believe that the Government should consult directly with learners, identify and address the issues raised and reflect on this when testing and evaluating the new study programmes for 16 -19 year olds. This should cover the pedagogy of teaching for all three study programmes distilling what works, why and in the case of marginal learners what effects drop out and non achievement of the qualification. Central questions such as developing career paths and enhancing job prospects should be an intrinsic part of this consultation and in turn inform the design and content of the new study programmes.

7. Applying technology to support delivery of Level 3 Qualifications

At a time of on-going financial restraint we would welcome the opportunity to work with Government and Awarding bodies to examine and assess the value, use and application of technology in the delivery of Level 3 qualifications to improve both product and outcomes for the learner. Our particular focus is to utilise technology in order to create more robust and efficient assessment practise to drive the take up and success of occupational qualifications. In areas of very high delivery costs such as in London technology can play an increasingly important role in both improving productivity and controlling cost but requires clear leadership from both providers and awarding bodies.