



Department  
for Education

**Consultation Response Form**

**Consultation closing date: 10 May 2013**  
**Your comments must reach us by that date.**

**Government proposals to reform  
vocational qualifications for 16-19 year  
olds**

**Consultation Response Form**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online response facility available on the Department for Education e-consultation website (<http://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.**

Reason for confidentiality:

Name Nick Johnstone

Organisation (if applicable) GuildHE

Address: Woburn House, Tavistock Square, London WC1H 9HB

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

Please mark an 'x' in the box that best describes you as a respondent.

<input type="checkbox"/> School/Academy	<input type="checkbox"/> FE College	<input type="checkbox"/> Sixth Form College
<input type="checkbox"/> HE Institution	<input type="checkbox"/> Training Provider	<input checked="" type="checkbox"/> Sector Representative Organisation
<input type="checkbox"/> Awarding Organisation	<input type="checkbox"/> Employer/Representative Organisation	<input type="checkbox"/> Member of the Public
<input type="checkbox"/> Parent/Carer	<input type="checkbox"/> Other	

Please Specify:

GuildHE is a formally recognised representative body for higher education institutions in the UK. Our members include smaller, specialist and vocationally-focused universities and university colleges, many of which specialise in subject areas which are critical for the UK's skills base, growth industries, and cultural sector.

Our interest in this consultation therefore encompasses both (1) progression to higher levels of learning, including Higher Education, and (2) ensuring that young people are prepared well for the world of work in a wide range of different areas and sectors, including vocational and non-vocational routes into the employment market.

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

Yes

No

X Not Sure

Comments:

We support the ambition to ensure that qualifications are high value, challenging, and provide learners with good opportunities for progression beyond Level 3. We recognise that some rationalisation of qualifications may be helpful in meeting these ambitions, and we also believe that greater clarity and support for young learners about career progression opportunities will help achieve this. However, we are not convinced that the proposed categorisation is necessarily the right way to achieve the Department's ambitions.

1. We do not think the categories as outlined will necessarily reflect the diversity of progression routes open to young learners, or support that diversity going forward:

- Many different Vocational Qualifications are valued by higher education providers for progression to HE. This includes, but is not limited to, vocationally-focussed HE courses which lead into specific professions.
- Some routes into HE depend on qualifications which learners may be discouraged from taking under the proposed classification.
- This includes combinations of A levels with other qualifications – an increasingly common route into higher education, which the proposed reliance on categorisation may discourage. A lot will depend on how the detail of the standards for recognition in performance tables is worked out.
- We have strong concerns about the proposed application of the category 'Academic', as it may deter progression to higher education via other qualification routes. It also does not sit well with the proposed approach to content and synoptic assessment for vocational options.
- Overall, there is a risk that the proposed categorisation framework would create perverse incentives for educational establishments to drop their support for options which would otherwise be valuable for learners' progression beyond Level 3.

2. Flexible progression opportunities are vital:

- The proposal risks narrowing students' opportunity and flexibility at a point in their education when they need the greatest possible choice to consider their future career.
- We would caution against a categorisation which pushes young people towards a narrow career trajectory at an early age.
- Higher education must remain an option for young people taking any qualification

which facilitates HE entry, regardless of any categorisation used.

- Wherever possible, the qualifications framework should encourage parity of opportunity for progression.

3. We would support an approach which provides greater clarity on progression pathways into higher education for learners, schools and colleges, and parents, and which could also support HE providers to assess applications to HE.

- As noted above, many students now take VQs in combination with A levels.
- It is important that any system reflects that this route, as well as VQ-only routes, can be a valued route into HE.
- It is also worth noting that the Higher Education Funding Council for England is currently consulting on ways of freeing up university places for high achievers holding combinations of A levels and VQs.
- UCAS is currently working to establish 'Qualification Information Profiles' for qualifications for Level 3 qualifications. We expect this to provide a valuable source of information for HE admissions, and we would encourage the Department to take note of this work.

4. We encourage the Department to continue to engage with a wide range of higher education providers as any reforms are taken forward. This will be particularly important to establish how these HE providers value different qualifications for progression:

- GuildHE would be happy to facilitate engagement with our member institutions as the Department works to map out progression pathways and the mechanics of any new system.
- Many GuildHE universities focus on vocational HE and have strong links to industry, and many young people target these institutions specifically as part of their career ambitions.
- Any work which supports HE providers in assessing qualifications as part of the HE admissions process would be welcome.

5. The Department is now enacting a large number of other changes in the Education sector. When considering whether to adopt a new categorisation, care should be taken to avoid unnecessary additional confusion and turbulence for learners, teaching establishments, employers and university admissions staff.

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

Yes

No

Not Sure

Comments:

See our answer to Question 1. A thorough investigation of how employers and higher education providers value VQs will be vital. GuildHE would be happy to facilitate engagement with our member institutions.

3 How would these reforms impact on current apprenticeship frameworks?

Comments:

VQs taken as part of current apprenticeship frameworks should be incorporated into the new vocational suite of qualifications.

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

Academic

Occupational

Applied General

X Not Sure

Comments:

See also our answer to Question 1.

There is much legitimate diversity in progression routes beyond Level 3. While we would welcome further progress to provide greater clarity around progression beyond Level 3 and to ensure high standards (including further work with HE providers and employers), restricting this diversity unnecessarily would be counterproductive.

In respect of the proposed categories, we would add the following points:

- The framework must not create perverse incentives for educational establishments to drop options which would otherwise be valuable for learners' progression beyond Level 3.
- We are not convinced the categorisation would deliver parity of esteem across qualifications or outcomes. The proposed categorisation risks de-valuing some VQs in the eyes of employers, universities, learners and parents, as well as teaching establishments.
- We have strong concerns about the proposed application of the category 'Academic', as it may deter progression to higher education via other qualification routes. It also does not sit well with the proposed approach to content and synoptic assessment for vocational options.
- We do not think the categories as outlined will necessarily reflect the diversity of valuable progression routes open to young learners, or support that diversity going forward. Many routes into HE depend on combinations of qualifications which cut across the proposed classification. It is vital that learners are not discouraged from taking these combinations.
- Standards should be consistent wherever appropriate.

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

X Yes

No

Not Sure

Comments:

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

Yes

No

X Not Sure

Comments:

Qualifications should be high-value and challenging, supporting progression beyond Level 3 through a variety of routes.

Progression into higher education is important here. Progression from VQs into HE is significant in volume, and many HE courses focus on technical vocations and have strong links to industry – for example, in the Creative Industries or Land-Based sector. Many learners target these courses specifically as part of their career ambitions.

More work should be done, involving HE providers, to establish what qualifications are valued for HE progression.

Wherever appropriate, parity of opportunity across different progression routes – A levels, VQs – is imperative.

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

Comments:

The qualifications framework should be underpinned by an appropriate level of consistency across different categories of qualification.

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

Comments:

We encourage the Department to continue to engage with a wide range of higher education providers to establish how these HE providers value different qualifications for progression. Entry requirements for HE courses will vary and it will be challenging to identify every VQ which will facilitate entry to higher education. Wide-ranging engagement with the HE sector would be the best approach.

GuildHE would be happy to facilitate engagement with our member institutions. Many of GuildHE's HE provider members focus on vocational HE and have strong links to industry, and many young people target these institutions specifically as part of their career ambitions.

Specifically on the proposed 'Occupational Qualifications', the Department will need to engage HEIs which rely on these qualifications for specific vocational courses.

Please also see our comments under Question 1 above on UCAS's development of 'Qualification Information Profiles' for HE admissions.

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

Yes

No

X Not Sure

Comments:

As outlined above, a consistent approach should underpin the standards adopted by the qualifications framework.

We would not wish to see an outcome where the standards for Occupational Qualifications become too fixed a 'norm' for entry into employment. There is a risk that such an arrangement would fail to adapt dynamically to future economic changes, and that it would restrict opportunities for young people and many employers (possibly SMEs in particular), and stifle economic dynamism and growth.

The Department will also need to engage HEIs which rely on these qualifications for specific vocational courses. The reforms present a good opportunity to provide greater clarity on pathways into the professions via higher education – particularly through the many high-value vocational HE courses available to students.

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

Yes

No

Not Sure

Comments:

(No response.)

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

Comments:

This may be another area where engaging higher education institutions would be valuable. GuildHE's HE providers have strong links to industry, to their local communities, and to local schools, and deliver many high-quality vocationally-oriented HE courses.

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

Comments:

(No response.)

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

X Yes

No

Not Sure

Comments:

Young adults suffer particularly badly in the current employment market. It is very important that young adults are given opportunities for skills development, including the acquisition of new skills and qualifications.

The system should support 18-25 year-olds who wish to progress to higher education, including high-quality vocational HE courses with good routes into professions.

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

No

Not Sure

Comments:

We would argue for a consistent approach across Applied General Qualifications and Occupational Qualifications.

14 Do you have any other comments?

Comments:

(No response.)

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

**Please acknowledge this reply**     X

**E-mail address for acknowledgement:** [Nick.johnstone@guildhe.ac.uk](mailto:Nick.johnstone@guildhe.ac.uk)

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Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

X Yes	<input type="checkbox"/> No
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All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: [carole.edge@education.gsi.gov.uk](mailto:carole.edge@education.gsi.gov.uk)

**Thank you for taking time to respond to this consultation.**