



Department
for Education

Consultation Response Form

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

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

Consultation Response Form

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential.

Reason for confidentiality:

Name Matthew Harrison
Organisation (if applicable) The Royal Academy of Engineering
Address: 3 Carlton House Terrace
London
SW1Y 5DG

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

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

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

Please Specify:

Founded in 1976, The Royal Academy of Engineering promotes the engineering and technological welfare of the country. Our fellowship – comprising the UK's most eminent engineers – provides the leadership and expertise for our activities, which focus on the relationships between engineering, technology, and the quality of life. As a national academy, we provide independent and impartial advice to Government; work to secure the next generation of engineers; and provide a voice for Britain's engineering community.

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

Not Sure

Comments:

Research published by the Royal Academy of Engineering (for example *Jobs and growth*, RAEng, 2012, Greenwood et al, RAEng, 2011) and many others show the superior labour outcomes obtained by those who progress in STEM subjects beyond the age of 16. In particular, the wage premium research reported by Greenwood et al. demonstrates that the **subject** of a qualification influences wage outcomes and not just the **level** of a qualification. The research confirms that progression to at least Level 3 qualifications in STEM (and non-STEM) subjects is particularly important when it comes to labour market outcomes.

With this in mind, we welcome the proposals to end the practice of counting all Level 3 qualifications as 'equivalent' in school and college performance tables as they are clearly not equivalent in terms of their labour market outcomes. This applies to **all** qualifications whether they are deemed 'academic' (in the consultation this is taken to basically mean A levels plus the IB) or 'vocational' (up to the point of the consultation this ill-fitting term was used by the Department for Education to describe all Level 3 qualifications other than A levels and the IB). Therefore, we also welcome the opportunity given by this consultation to arrive at better description for classes of Level 3 qualification.

Section 1 of the consultation (the 'case for change') is weak and the data it presents is incomplete. It points to the higher rates of growth in vocational qualifications without regard to the considerable emphasis placed on widening participation in Higher Education that took place during that time. It does not consider trends in youth employment over that period.

In a few brief paragraphs, Section 1 points to well-documented STEM skills shortages in the labour market such as those for electricians, plumbers and technicians. It points out that only 7% of 16-18 year olds on Level 3 vocational courses are taking 'occupational' qualifications whilst 42% are taking 'general vocational' qualifications such as the BTEC. However, it does not attempt any analysis of the published literature that would explain some of these data.

In the main, young people and those that advise them aspire to Higher Education – repeated studies tell us this continues to be true. The growth of 'general vocational' qualifications can be explained by a number of factors listed in the consultation document (marketing by colleges and the view that they are 'easier') but also by their inclusion in UCAS tariff tables. 'Occupational' qualifications are not given UCAS points.

Put simply, young people are able to hedge their bets when they choose a general vocational qualification in say engineering over an 'occupational' qualification. In a very uncertain labour market they are keeping a door open to higher education in case they should want it or need it later.

For reasons such as these, only 60% of UK domiciled students accepted onto undergraduate engineering programmes (JACS Group H) hold only academic qualifications with a further 18 percentage points holding only BTEC or OCR applied general qualifications and a further 5 percentage points hold a mix of the two. Unfortunately the UCAS data is not able to identify the remaining 17% - but they will be 'other qualifications (foreign, access courses etc.).

Therefore, whilst we agree that an improved method for classifying Level 3 qualifications is needed, and whilst the three proposed titles are broadly correct, we urge the Department for Education to take great care in how these are described otherwise significant pathways into engineering higher education could be shut off at a time when there is increasing demand for engineering graduates.

The proposed definitions for academic and occupational qualifications are broadly correct although they could be sharpened thus:

The broad purpose of academic qualifications is to prepare for and secure access to higher education although for some, personal development can also be a worthwhile purpose.

The purpose of occupational qualifications is to facilitate the transition to a particular occupation.

However, in the definition of 'applied general qualifications more should be done to reflect the dual-purpose of applied general qualifications: to advance learning in a particular subject or discipline **and** to provide access to Higher Education, with or without accompanying A levels, for those that want it.

Finally, the Department for Education should make it clear – there will always be fewer 16-18 year olds taking occupational qualifications at Level 3 than other classes of qualification. The Level 3 occupational qualification is an *advanced level* occupational qualification and not one commonly taken for entry-level jobs in the labour market. Only those 16-18 year olds lucky enough to expect to gain a start in the labour market at associate professional level will be attracted to them.

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

X Yes

No

Not Sure

Comments:

The proposed classification will not cope well with applied general qualifications at Level 3 that are approved as the technical certificate in advanced apprenticeship frameworks. In the case of engineering, this means a significant number of BTEC and City & Guilds qualifications.

Furthermore, many of these qualifications are approved by professional engineering institutions as providing evidence of meeting the education requirements of the *EngTech* technician standard. These are listed on the Engineering Council website.

These qualifications have the characteristics of both applied general **and** occupational qualifications and therefore are of particularly high value to those that possess them. This important feature should not be lost in the proposed classification system.

3 How would these reforms impact on current apprenticeship frameworks?

Comments:

It is important to note that some applied general qualifications are approved for inclusion in SASE Apprenticeship frameworks and many are also approved by professional bodies for professional registration. It is important that these valuable routes to high-wage engineering occupations are not adversely impacted.

Our concern is if such qualifications displaying characteristics of **both** applied general and occupational qualification fail to register in school and college accountability measures simply because they don't fit a classification system then there would be little incentive for schools and colleges to offer them. This point does not just apply to qualification when taken as part of an apprenticeship framework.

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

Academic

Occupational

Applied General

Not Sure

Comments:

We welcome the loss of the broad 'vocational' classification as it is often used inappropriately in policy circles. The McLoughlin report *It's about work* provides a more complete definition of the term *vocational*. The introduction of 'occupational' and 'applied general' are an improvement in that they avoid this confusion.

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

No

Not Sure

Comments:

No specific comment.

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

Yes

No

Not Sure

Comments:

The proposal for Applied General Qualifications is to base standards on seven characteristics – size, grading, external assessment, synoptic assessment, appropriate content, progression and proven track record.

We broadly agree with the proposals but note that the Royal Academy of Engineering has particular expertise and experience in using the *Individualised Learner Record* database through our FE STEM Data Project (now in its third year). Therefore we have been able to ascertain **precisely which** key qualifications, respected and valued by engineering higher education and employers alike, meet the proposed standards. Engineering is an important sector of the economy where there are significant skills gaps. Therefore, in refining these proposals the Department for Education should take expert advice from the Royal Academy of Engineering on how they will impact engineering. The Department should urge other sectors to follow the example set by the engineers and get to understand the qualifications awarded for their sector.

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

Comments:

We recommend 25%, in line with practice at Key Stage 4.

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

Comments:

UCAS tariff for a qualification is a poor proxy for value in Higher Education – subject is important too. Engineering Higher Education in the UK is a complex structure of 182 independent institutions offering admission to engineering undergraduate programmes through the UCAS system. Applied general qualifications are of particular significance to some, but by no means all of these (overall they feature in nearly a quarter of admission). Therefore, advice on which qualifications are valued by HE *in general* should be sought from the engineering profession, starting with the Royal Academy of Engineering.

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

Yes

X No

Not Sure

Comments:

The proposal for occupational qualifications is to base standards on four characteristics – size, employer endorsement, assessment and progression.

We agree in broad terms with the proposals on size (minimum 150 guided learning hours) and on assessment. However, the proposals on employer endorsement are weak with no evidence that they have been thought through. We recommend these are replaced with endorsement by professional bodies – which are accustomed to such work.

The notion of progression to engineering higher education through an occupational qualification at Level 3 is flawed. We do not believe this is likely.

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

Yes

X No

Not Sure

Comments:

The advice of professional bodies, where available, should be sought for each sector of the labour market.

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

Comments:

This component of the proposals looks poorly thought out and unlikely to happen in any systematic way.

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

Comments:

Professional bodies should be involved in the relationship between awarding bodies and employers.

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

No

Not Sure

Comments:

Not all learners progress at the same rate or have equal access to the best progression options from a young age. Therefore, qualifications that are selected to count in 16-18 accountability tables should still be funded for those aged 19-24 in order to safeguard the skills pipeline.

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:

Not all learners progress at the same rate or have equal access to the best progression options from a young age. Therefore, qualifications that are selected to count in 16-18 accountability tables should still be funded for those aged 19-24 in order to safeguard the skills pipeline.

14 Do you have any other comments?

Comments:

None

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: Matthew.harrison@raeng.org.uk

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

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 10 May 2013

Send by post to:
Department for Education
Exclusions Team
Level 2
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Send by e-mail to: 16-19vgCONSULTATION@education.gsi.gov.uk