

# Promoting achievement, valuing success: a strategy for 14-19 qualifications

## Consultation Response Form

The closing date for this consultation is: 23 June  
2008

Your comments must reach us by that date.

department for  
**children, schools and families**

**THIS FORM IS NOT INTERACTIVE. If you wish to respond electronically please use the online or offline response facility available on the Department for Children, Schools and Families e-consultation website (<http://www.dcsf.gov.uk/consultations>).**

The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

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

Name Gerry Rogers  
Organisation (if applicable) Edexcel Ltd  
Address: 190 High Holborn, London WC1V 7BH

If your enquiry is related to the policy content of the consultation you can contact Ben Ramm on:

Telephone: 0114 2593412

e-mail: [ben.ramm@dcsf.gsi.gov.uk](mailto:ben.ramm@dcsf.gsi.gov.uk)

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794113

e-mail: [consultation.unit@dcsf.gsi.gov.uk](mailto:consultation.unit@dcsf.gsi.gov.uk)

Please tick one box that best describes you as a respondent

<input type="checkbox"/> Head teacher	<input type="checkbox"/> Teacher	<input type="checkbox"/> Governor
<input type="checkbox"/> School	<input type="checkbox"/> Local Authority	<input type="checkbox"/> Parent
<input type="checkbox"/> Union	<input type="checkbox"/> Higher Education Body/Official	<input type="checkbox"/> Further Education Body/Official
<input type="checkbox"/> Employer	<input type="checkbox"/> Young Person aged 19 or under	<input type="checkbox"/> Other (please specify below)
<input checked="" type="checkbox"/> <b>Awarding body</b>		

Please Specify:

Edexcel is the UK's largest awarding body, providing academic and vocational qualifications to over 25,000 places of learning here and in over 100 countries worldwide. In the UK, Edexcel offers qualifications and testing in over 24,000 schools, 450 further education colleges, more than 80 higher education institutions, 600 public and private sector employers and, increasingly, e-learning providers. Our qualifications include A Levels, GCSEs, NVQs and GNVQs, Key, Basic and Functional Skills, and the vocational BTEC suite that provides progression from pre-GCSE levels through to sub-degree Higher National Diplomas, and tailor-made qualifications for employers. We also offer a range of Foundation Degrees. Edexcel is part of Pearson, the world's largest educational services business.

1 Do you agree with the aim to simplify the qualifications system and create a more comprehensive and coherent qualifications offer for all young people?

**X Agree**

Disagree

Not sure

**Comments:**

Edexcel broadly supports these aims. 14 – 19 represents a critical stage of learning when personal development is nurtured and life chances set. The determining factor in learning at this stage should, as the Strategy Paper recognises, be: what is best for the learner? Thus while simplification is important, particularly in being able to ensure that the qualification offer is coherent for young people, wherever possible this should not be at the expense of the needs of the learner. In pursuit of that principle, Edexcel proposes the following:

- The Foundation Learning Tier (FLT) should be positioned in the 14 – 19 qualification framework as a common entry tier feeding into the other routes, not as a parallel to them. The FLT is a critical component of the 14 – 19 framework, it provides the platform for learning and progression below level 2; indeed the Strategy Paper itself describes its role as *“to prepare learners fully for level 2 and beyond.”* It therefore needs to be located as such.
- The stand alone qualification route should be clearly set alongside the other routes in the framework as a distinct offer for those young people who wish to pursue a more vocationally based programme of learning. An enormous number of young people already take BTEC, City and Guilds, NVQ and OCR National qualifications, most of which are well known by employers and higher education. The time constraints mean not all would fit neatly into Additional and Specialist Learning yet they provide an important progression route into further study or employment.
- As is often the case with qualification frameworks, once routes or ‘suites’ are laid down, it can be difficult to secure transfer and progression between them. The Paper makes a number of useful suggestions about how this might happen such as the wider use of a credit framework. Edexcel believes that it may be premature to tackle a 14 – 19 credit framework at this stage and that this may be better be factored into the 2012 review and that for the present, issues of progression and transfer should be tackled by the new Approval Committee

2 Do you agree with the new criteria against which decisions will be taken about qualification approval?

**X Agree**

Disagree

Not sure

Comments:

Edexcel welcomes the commitment not to withdraw funding from nationally available free-standing qualifications before 2012, where they:

*'meet the needs of a group of learners, employers, universities and wider society better than any within the main pathways can do... in a sufficiently wide range of circumstances'*.

Edexcel agrees that:

*'the overriding priority will be to secure the interests of learners and employers'*

and welcomes clarification on how JACQA will recognise and interpret these.

Edexcel further welcomes clarification of the independent membership of JACQA and trusts that this will give due weight to teachers and tutors most experienced in working with the full range of learners aged 14-19, across all relevant provider types.

3 Do you agree with our approach to bringing the best of the existing qualifications offer within Diploma Additional and Specialist Learning?

Agree

**X Disagree**

Not sure

Comments:

Edexcel welcomes the opportunity for proven and well respected qualifications and component units to be incorporated within ASL, especially those engaging learners in the practical activities and skill acquisition which are essential to employers. Edexcel does not agree however that ASL:

*'allows existing vocational qualifications to be included in the Diploma framework'*

because its time allocation is smaller than that required by many such qualifications. ASL does allow inclusion of discrete units and their disconnection leads to a loss of curriculum coherence and dilutes *'the best of existing provision'*. Edexcel believes that ASL only supports the aim of:

*'bringing in the best of existing provision'*

insofar as it complements a further set of national suites and frameworks.

4 In seeking to make the Extended Project available to all learners, what particular issues need to be resolved?

Comments:

Edexcel welcomes the Extended Project for Level 3 Diploma learners pursuing higher education and recognises its contribution to the development of Personal Learning and Thinking Skills (PLTS) alongside other elements of Generic Learning such as Functional Skills. Edexcel believes that some employers will also welcome applicants able to supply evidence of a well-integrated project.

Apprentices are however more likely to be attractive to employers because of their focused and practical skill acquisition. Moreover independent IAG would encourage Apprentices to pursue a learning programme which includes an NVQ, Functional Skills and a Technical Certificate, rather than a Level 3 Diploma. Furthermore apprentices are likely to be a small proportion of the Level 3 Diploma cohort in view of the persistent shortage of employer placements.

For those teachers and tutors engaging learners in the Extended Project, Edexcel welcomes additional and detailed guidance on the process by which internal assessment is to be externally verified in order to assure validity and consistency nationwide.

5 a) Do you agree with our proposed approach to Applied GCSEs?

Agree

**X Disagree**

Not sure

Comments:

These are General Applied Qualifications, as opposed to Vocationally-Related Qualifications (VRQs), and are therefore superseded by Diploma Principal Learning. The Government's intention to simplify the qualification system would therefore suggest the withdrawal of both Applied A Levels and Applied GCSEs. Moreover the logic for treating Applied A levels and Applied GCSEs differently in this context is not clear. In both cases, registrations are declining and there are far more learners achieving on free-standing Level 2 and 3 VRQs.

5 b) Do you agree with our proposed approach to Applied A levels?

**X Agree**

Disagree

Not sure

Comments:

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6 How can we best support progression between Diplomas and Apprenticeships?

Comments:

Progression to both Diplomas and Apprenticeships will result from impartial Information, Advice and Guidance. In particular the demand for Apprenticeships will reflect strong employer links and rich work placements, so that learners can apply their vocational skills. Edexcel recognises the Young Apprenticeships supported by Diplomas at Key Stage 4 but does not believe that this combination will be taken up significantly post 16. Indeed learners at this age are likely to select a programme of learning based on one, or other, but not both, especially in view of the comparatively different guided learning hours.

Nor will Diplomas offer an immediate route into skilled employment through Apprenticeships since the requirements and anticipated destinations of the two learning programmes are quite distinct. Apprenticeships require learners to demonstrate practical skills within the context of a contractual arrangement with an employer. Diplomas do not equip learners to do this outside specific ASL. It is therefore unlikely that Diploma learners will switch to Apprenticeships in numbers which would warrant a dedicated national transfer route. Such issues are effectively addressed at local level where consortia will conduct initial diagnostic assessments, coupled with appropriate IAG, with a view to guiding learners to the most suitable courses first time round. Where such decisions require review, alternative provision may be sought within an acceptable 'travel to learn' zone, taking account of scarce employer placements. Edexcel does not see evidence to suggest that the demand for this course of action warrants a structured national solution. Instead, attention might usefully be focused on procuring the scarce employer placements which more accurately secure the apprenticeship experience than 'programme-led' variants.

7 Do you agree that all young people learning at Entry level and Level 1 should have access to an appropriate Progression Pathway within the Foundation Learning Tier?

Agree

Disagree

Not sure

Comments:

Edexcel agrees that all young people working at Entry Level and Level 1 should have access to an appropriate progression pathway within the FLT. Edexcel sees the FLT as providing an underpinning foundation with the potential to widen learner access to the other national progression routes available at Level 1, eg GCSEs at grades G-D or the Foundation Diploma. The FLT can accredit the learning experiences from which vulnerable participants have been shown to benefit via schemes such as Entry to Employment, Key Stage 4 Engagement Programmes and Increased Flexibility. The challenge facing the FLT is therefore to populate the framework with attractive, meaningful and achievable learning activities, designed by experienced teachers and tutors. The demands placed on this provision will rise as the compulsory participation age takes progressive effect in 2013 and 2015. The FLT and its associated progression pathways are less significant than the learning activities of which they consist, as reflected clearly by both engagement and disengagement.

8 Do you agree that we should explore the introduction of a credit-based framework for 14-19 qualifications, with a view to implementing it by 2013?

Agree

Disagree

Not sure

Comments:

Edexcel believes the extension of the Qualifications and Credit Framework (QCF) to 14-19 provision is premature since many of its elements have yet to demonstrate that they function effectively. Examples include, the 'Managing Information Across Partners' (MIAP) IT system, the Unique Learner Number (ULN) and the Learner Achievement Record (LAR). Moreover, this proposal was not incorporated into plans for the recent and current redevelopments of GCEs and GCSEs. Furthermore schools, colleges and training providers are facing a period of unprecedented change on numerous fronts, both curricular and administrative. Edexcel therefore recommends postponing a review of the application of the QCF to 14-19 provision to 2013.

9 Do you have any other comments you would like to make in relation to the government's strategy for 14-19 qualifications?

Yes

No

Comments:

10 Please let us have your views on responding to this consultation (e.g. the number and type of questions, was it easy to find, understand and complete etc).

Comments:

This consultation was easy to find, understand and complete. In some cases, the phrasing of questions could usefully have been more open, permitting a more critical analysis and evaluation of the Government's proposals. (eg questions 1, 3, 4, 6). Question 9 was welcome but perhaps too open.

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**

Here at the Department for Children, Schools and Families 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?

**XYes**

No

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: <http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp>

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

Completed questionnaires and other responses should be sent to the address shown below by 23 June 2008

Send by post to:

Consultation Unit  
Department for Children, Schools and Families  
Area 1A  
Castle View House  
East Lane  
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Cheshire WA7 2GJ

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