



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	Susan Kay Executive Director
Organisation (if applicable)	Engineering Professors' Council (EPC)
Address:	PO Box 789 Godalming GU7 9FW

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 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	

The Engineering Professors' Council (EPC) exists to promote excellence in engineering in higher education.

We are a unique network of academics: all branches of engineering are represented within the membership: Aeronautical, Civil, Chemical, Electrical, Electronic, Manufacturing and Mechanical Engineering, as well as Minerals, Metallurgy and Marine Engineering and the broad areas of General engineering studies and those in which engineering is combined with a range of other topics. There are currently 76 institutional members encompassing nearly 6,000 academic staff (permanent FTE).

Together with other subject groups within higher education, we have an important stake in pre-university education to ensure that learners are equipped with the knowledge, skills and enthusiasm required to continue into higher education.

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:

We welcome the differentiation between 'Applied General Qualifications' and 'Occupational Qualifications'.

Also we welcome the avoidance of the term 'vocational' which, in the minds of many, has the association of lacking in academic and intellectual challenge.

However, the distinction between 'Academic Qualifications' and 'Applied General Qualifications' is much less clear cut. We would expect there to be academic challenge in any qualification in either of these categories and many A Level subjects have strong vocational content.

We object strongly to the suggestion in Section 1.4 of the Government's Policy Statement that "general vocational qualifications . . . are less likely to provide a direct route into skilled employment." There is a recognised shortage of higher level technicians and graduate-level engineers to serve the needs of UK industry. These needs would not be met through 'Occupational Qualifications'.

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

Yes

No

Not Sure

Comments:

Outside our experience base.

3 How would these reforms impact on current apprenticeship frameworks?

Comments:

This is outside our experience base. However, whatever system is adopted it should clarify and recognise the routes through apprenticeships, not confuse the issue even further.

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

Academic

Occupational

Applied General

Not Sure

Comments:

Engineering is both a vocational and a challenging academic subject. As an academic subject it has suffered from the stigma of being 'vocational', which in the minds of many, is equated to 'non-academic' and therefore lacking in intellectual rigour and challenge.

We are concerned, therefore, that labelling one group of qualifications as 'Academic' would imply that the others lack academic challenge and strengthen this misconception.

We would recommend that, if the distinction between 'Applied General Qualifications' and 'Academic Qualifications' is retained, then the latter be named 'General Qualifications'.

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:

It is important that the changes are implemented properly and that colleges have time to prepare for the changes. There may be a danger that these requirements are not met if the changes are implemented too quickly. So a grace period would be desirable.

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

Yes

No

Not Sure

Comments:

Size: We agree that a lower limit of 150 glh is about right and would not support it being higher than 180 glh.

Grading: We support the use of grading and would recommend that a more fine-grained scale than just 'Pass', 'Merit' and 'Distinction' be used.

External Assessment: See our comments in response to Question 7 below.

Synoptic Assessment: We support the inclusion of synoptic assessment and strongly advocate that this includes in-depth problem-solving elements rather than just testing retained knowledge without demonstrating the ability to apply it.

Appropriate Content: We support the requirement for there being a significant core of knowledge covering the underlying principles of the subject. However, it is also important that the development of the skills required to apply that knowledge be part of the curriculum.

For the study of engineering at this level, it is very important that the proportion of optional modules is small and that there is a significant technical backbone to the subject in the core. However, this should not preclude a small number of named pathways, such as mechanical engineering or civil engineering, being variants of the core programme of study provided that the academic and technical challenge is maintained in each pathway.

Progression: We agree that this is an important characteristic but see our comments in response to Question 8.

Proven Track Record: We are uncertain whether this requirement might preclude a pilot trial of a new qualification before a full launch. We assume and hope that this is not the intention.

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

Comments:

In order to maintain credibility and uniformity of standards, a significant proportion of the assessment should be external. While, undoubtedly, written examinations would be an important part of this assessment, we would recommend other forms of external assessment also being used. In engineering, it is quite possible to develop assessment of practical skills that meet the Ofqual definition of external assessment.

Project work forms an important and valuable part of an engineering course and it is entirely appropriate that this is credited in the qualification. While the nature of project work means that its assessment does not meet the Ofqual definition, we recommend that it be subject to rigorous external moderation. Indeed this principle should be applied to any form of internal assessment.

It is not clear that there is an overall consensus within the Engineering HE community as to what should be the exact percentage of external assessment. Nevertheless an assessment pattern of the form:

- 50% written examinations, externally assessed;
- 25% practical examinations, externally assessed;
- 25% project work, externally moderated;

would be a reasonable mixture suitable for assessing ability to succeed in an engineering degree course.

In addition to the overall grade, we recommend that the breakdown of marks be available.

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

Comments:

While determining the proportion of HE institutions that recognise an Applied General Qualification, as suggested in the consultation, will be difficult to perform with any exactitude, qualifications such as the BTEC Extended Diploma and the Advanced National Diploma are already used to gain entry onto HE engineering courses in many universities.

It is our experience that it takes time for any new qualification in this category to gain wide acceptance by admission tutors. Consequently, we would recommend that any new qualification be given time to establish its standing with HE admission tutors. The time required to gain acceptance is a strong function of the number of students presenting with a given qualification. If a large number of new qualifications are introduced simultaneously, it is likely that all will struggle to gain initial acceptance.

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

Yes

No

Not Sure

Comments:

As defined, it is unlikely that Occupational Qualifications would provide a direct route into engineering HE. Consequently, we consider this area to be outside our sphere of interest.

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

Yes

No

Not Sure

Comments:

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

Comments:

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

Comments:

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:

There are a significant number of young people who, for a variety of domestic, societal or environmental reasons, have not fulfilled their true potential by the age of 18.

It is clearly both in their own and society's interest that they are given the opportunity to further develop their potential and enhance their employability.

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:

See the comment to Question 12 above.

It is our experience in HE that the presence of mature students in a course makes a very positive contribution to the ethos of that student cohort. Younger students benefit from the example of their older fellow students in many ways including a greater confidence and readiness to ask questions and a more mature attitude to work.

We see no reason why the academic criteria for funding should be any different to those required for entry to the Level 3 course. It is outside our scope to comment on any non-academic criteria that might be used to provide funding.

14 Do you have any other comments?

Comments:

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

E-mail address for acknowledgement: s.kay@epc.ac.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?

Yes

No

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: 16-19vq.CONSULTATION@education.gsi.gov.uk