

LSDA responds



**14-19:
extending opportunities,
raising standards**

Published by the
Learning and Skills Development Agency.

www.LSDA.org.uk

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Registered with the Charity Commissioners.

Editor: Jennifer Rhys
Designer: Dave Shaw and thingswedo
Printed in the UK

ISBN 1 85338 781 9

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Development Agency 2002

1350M/06/02/9000

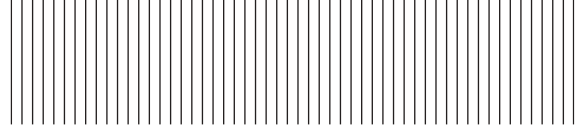
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**LSDA's Policy and Communications Unit is
supported by the Learning and Skills Council
as part of a grant to the LSDA.**



This paper sets out the Learning and Skills Development Agency's response to the Green Paper consultation 14–19 extending opportunities, raising standards. The original consultation document can be found on the internet at: www.dfes.gov.uk/14-19greenpaper/

General comments

- 1 This section of our response addresses broad issues that do not fit neatly into the consultation questions, or which we believe are of particular significance to the overall strategy for 14–19 reform.
- 2 We welcome the vision set out in the Green Paper, and in particular the acceptance that reform is needed to a system that fails a large number of young people and values only a limited range of achievement.

14–19: the transition phase

- 3 The Green Paper places great emphasis on the need for coherence for 14–19 year olds. The language of '14–19' suggests that we have institutional, curricular and legal (compulsory leaving age) structures to match that phase, but in reality this is not the case. This affects what the government can realistically achieve in terms of policy. Therefore, strategies to achieve coherence need to recognise:
 - the diverse institutional arrangements operating in the upper secondary phase
 - the reality that a large number of young people change institutions at age 16
 - the fact that education is not compulsory beyond age 16.
- 4 Moreover, the transition from the 14–16 to the 16–19 phase of education – from compulsory to voluntary participation – remains the most significant transition in the education of young people. For example, it includes:
 - choice of a wider range of curriculum opportunities, with significant implications for life chances
 - a significant change of ethos, associated with greater maturity and transition to adulthood
 - for many young people, transition between institutions.

- 5 Therefore, we suggest that a key to success in transforming participation and achievement levels among young people will rest on effective strategies to manage the key transition at 16.
- There will need to be a major focus on supporting young people to handle transition – whether transition between institutions or transition to a new curriculum.
 - Significant effort will be required by institutions to collaborate to achieve coherence.
 - Recognition of achievement at 16 will remain vitally important and qualification structures and recording mechanisms need to ensure that learners have a full and portable record of all their achievements at this stage. While we support the introduction of a Matriculation Diploma, an award at 19 could be too distant to be motivating for a 14 year old. Short-term successes and goals are essential to motivate young people across this phase of learning.

GCSEs

- 6 In light of our previous point, we recommend that GCSEs – as the major measure of achievement at 16 – should not be diluted or downgraded by becoming a ‘progress check’. They are a significant aspect of the transition stage to the new range of learning opportunities post-16, and form a basis for important decisions about progression routes. We would describe GCSEs as marking a crossroads – or major interchange – rather than a milestone.
- 7 However, alongside this we feel that there is a need to reform the existing GCSE to create a stronger sense of achievement at foundation level. The current model essentially labels those who ‘achieve’ GCSE at foundation level (grades D–G) as having failed, and the only possibility for progression to intermediate level is to retake the same qualification. This is both demotivating and demoralising for students. A stronger recognition of achievement at foundation level is needed to help motivate lower achieving young people to stay on and progress to intermediate level during their 16–19 years if possible.
- 8 We therefore recommend that, to address these weaknesses, the award should be developed into a unit-based structure with units achievable at both intermediate and at foundation level. To increase the flexibility, we recommend that assessment become primarily internal, with external moderation, to enable learners to progress at their own pace and to promote greater integration of assessment with the learning process. Learners could build up units, whether applied or academic, towards their GCSEs at foundation and at intermediate level.

The ‘alternative pathway’

- 9 We strongly recommend that this review of 14–19 strategy should result in a re-examination of the general vocational pathway. We believe that this pathway has been seriously eroded to the point that it no longer represents a real alternative to general, academic programmes.
- 10 The imposition of assessment models designed for academic learning outcomes has undermined GNVQs as an alternative route for those learners motivated by more applied and practical learning. The portfolio and internal assessment that can reliably assess application and practical skills have been increasingly replaced by external testing, which is more suited to academic knowledge and understanding. This significantly changes the nature of what can be assessed and therefore considerably affects learning styles and outcomes, removing some of the practical elements of the curriculum. A similar shift in key skills assessment towards more external testing means that integration of key skills has effectively been lost, further undermining a significant feature of this alternative pathway.
- 11 This leaves a significant gap in the qualification options available. In fact, anecdotal evidence suggests that, as a result, there is increasing interest from providers in BTEC Nationals in preference to AVCEs at advanced level. There is also serious concern about options at foundation and intermediate levels if GNVQs are replaced by ‘vocational’ GCSEs assessed on the existing GCSE model. We understand from Edexcel that schools in particular are expressing interest in the BTEC Firsts as a stronger vocational alternative at this level.

- 12 To meet the needs and recognise the talents of the full range of 14–19 year olds, it is essential that the purpose and design of this pathway be re-assessed.

Pedagogy and curriculum reform

- 13 Although we recommend reform to the qualification structures, we recognise that change to qualifications alone will not necessarily achieve a more coherent or comprehensive curriculum. Motivating and challenging curricula can be facilitated, but not guaranteed, by well-designed and relevant qualifications.
- 14 A strategy to improve the quality of the learning experience needs to look at pedagogical skills alongside curriculum and qualification reform. To achieve the ambitions in the Green Paper this must be recognised in the implementation strategy. Wider activities, work-related and more vocationally oriented opportunities for young people will only be motivating if investment is made in developing appropriate, innovative pedagogical approaches that take account of the needs of this age group.

Acceleration

- 15 We are cautious about the importance of acceleration as a driver for policy formulation in relation to 14–19 provision. On the one hand, we believe that the needs of those who are not capable of acceleration is a more significant issue for policy. On the other hand, we believe that breadth is more important for young people than acceleration.
- 16 To formulate policy around a belief that acceleration should be an option for large numbers of young people would be a mistake in our view, and will tend to reinforce a 'credentialist' approach to education. The development of young people between 14 and 19 requires more than the achievement of formal qualifications at the most rapid pace possible. The significance of social and personal development and maturation among peers should not be ignored. We therefore believe that the provision of greater breadth and wider opportunities should be given greater policy attention than acceleration.

The lifestyles of young people

- 17 Just as 14–19 provision should consider personal and social as well as academic development, so too, it should take account of the changing aspirations and lifestyles of young people. Discussion about 16–19 education is couched almost exclusively in terms of full-time study. However, many young people are in fact studying part-time (for example, single AVCE programmes and 2 A-level programmes are not uncommon sixth-form study patterns), and the role of substantial part-time work in young people's lives has increasing significance.¹
- 18 However, part-time study is not part of the policy discourse associated with 16–19 year olds and is not reflected in the vision described by the government. The possibility that increasing numbers of young people could be motivated to continue their education by combining part-time study with substantial part-time work should in our view be given greater prominence in policy development in this area.
- 19 Recognition of part-time study alongside part-time work as a valid route would ensure that the government's vision resonates more closely with the experiences of young people and would help to foster greater interconnectedness between work and study. For example, young people could be encouraged, through their formal studies, to reflect and analyse their working experience or carry out research into the employment sector to develop their understanding of the economic context in which they are working.

Overarching award – Matriculation Diploma

- 20 We see the overarching award as potentially useful. As it stands it could offer institutions a stronger lever for encouraging breadth and motivating young people to engage in wider activities, and a mechanism for recognising a wider range of achievement, including reflection on learning through part-time work as suggested above. This alone could be highly motivating for many learners.

- 21 The proposed Matriculation Diploma offers only a voluntarist structure with limited prescription and we would want to leave scope to develop a stronger model in time on the basis of further engagement of key stakeholders. Further detailed views about design of the Matriculation Diploma are included in our response to chapter 4.
- 24 For the 16–19 phase we also suggest that a stronger entitlement is needed. This could set out the broad range of options that should be available to any young person in terms of work-related, academic and work-based options. We believe that development and gradual promotion of an entitlement are needed to raise the profile of the wider options available to young people, and ensure that young people, in reality, have access to the range of academic and vocationally oriented options.

Entitlement

- 22 We suggest that it would be helpful to articulate a stronger notion of entitlement, for 16–19 year olds as well as for 14–16 year olds, to achieve the promise of wider options and greater flexibility outlined in the Green Paper. Without a strong notion of entitlement, there is a danger that schools in disadvantaged areas where low expectations prevail, and where parental confidence to demand greater choice is limited, will offer only a restricted curriculum. However, if entitlement is to be meaningful, it should be based on an appraisal of the practical and cost implications of the proposals and the actual resource available for implementation. (See question 46 for further consideration of this issue.)
- 23 For 14–16 year olds there is a stated entitlement to subjects beyond the compulsory curriculum, to be delivered by individual providers or by partnerships of providers. We suggest that in addition there should be an entitlement for young people to have access to a specified range of the new GCSEs in vocational subjects. Unless these are available to all learners, their capacity to achieve a high status will be hampered, as they will not be associated with the mainstream opportunities of young people. We welcome the recently established entitlement to a Modern Apprenticeship although we feel that this needs to be specified in more detail.
- 25 In the same way that the Green Paper suggests that the entitlement to access to subjects for 14–16 year olds should be a matter for local decision, we suggest that a specified entitlement, including vocational options, should be determined locally through partnership arrangements, and with the engagement of Local Learning and Skills Councils (LSCs).

Implementation issues

- 26 We welcome the proposal for pathfinders to develop and test out the practical implications of the proposals. There are distinctive implementation issues arising from different aspects of the proposed developments – the extended opportunities and choice proposed, the more varied pace, encouragement of more individualised programmes and the delivery of these through collaborative partnerships.
- 27 The different elements of the proposals will generate challenges in terms of practical implementation and management, staff development needs and additional delivery costs. (We explore these further in response to questions 35 and 46.)
- 28 These costs need to be carefully explored through the pathfinders to inform implementation. In particular, we suggest that it will be important to identify and understand the different elements of cost in order to arrive at a realistic assessment of the resources required for implementation and therefore to determine the model of entitlement that can be offered on a universal basis. In our view, it would be preferable for the entitlement to be universal, but realistic, rather than aspirational and unevenly available.

29 While the cost and management implications will be significant, we do not believe they will be insurmountable, if carefully assessed and planned for.

Next steps

- 30 In responding to the Green Paper, we are aware that it covers a very wide range of issues and that many elements of the proposals are interdependent. For example, if the government decides to opt for a compulsory model for the Matriculation Diploma, there are implications for the qualification reforms proposed in this response.
- 31 As a result, we suggest that, given the breadth of this consultation and the range of variables, responses may not provide a clear steer for government on detailed reform. We therefore urge the government to view this consultation as the first stage of a longer process of engaging key stakeholders, including employers and higher education as well as the general public and young people themselves, in developing a detailed, long-term model for change. This needs to be factored into the timescale for implementation.
- 32 In the following sections we provide detailed responses to the consultation questions in the Green Paper.



Chapter 1

The vision for the 14–19 phase

Question 1

Do you share our vision of the 14–19 phase?

Yes with reservations

- 33 We welcome the vision set out in the Green Paper. Above all, we welcome the opportunity afforded by the Green Paper for a wide-ranging and radical debate about how provision for 14–19 year olds needs to develop, taking a longer term rather than a short-term view. In particular, the vision:
- makes it clear that the current system, which does not develop the potential of a significant proportion of young people, is no longer acceptable
 - acknowledges that learning that takes place outside formal qualifications and outside the classroom is valuable and can be highly motivating
 - indicates the importance of valuing a much wider range of learning – this includes vocational, work-related and work-based, community and voluntary activity, as well as classroom-based learning
 - puts the needs of the individual learner at the heart of the system and emphasises the need for young people to be challenged to achieve more highly
 - makes a good case for the development of technical and vocational pathways that are as valued as the traditional academic pathways
 - recognises the importance of securing the involvement and support of employers in shaping the 14–19 education reforms
 - emphasises both the social and economic objectives of education and stresses the importance of breaking down the barrier that socio-economic background can often pose to educational success.
- 34 As we suggest in our introductory comments, however, it is important to recognise that institutional, curricular and legal structures continue to reinforce a transition point at 16. While a coherent view of the 14–19 phase is welcome, the transition from 14–16 to 16–19 will remain significant and will require effective management if the government is to achieve its aim of raising participation in post-compulsory learning.
- 35 We appreciate that the government is consulting widely with young people to gain their perspectives on the vision. We believe this is vital to understanding the developing lifestyles and aspirations of young people and how these need to be reflected in choices available to them.



Chapter 2

14–19: marking the start of the phase

Question 2

Do you agree that the aims set out in paragraph 2.6 are the right ones to mark the start of the phase?

Yes

- 36 We broadly endorse the aims set out. We particularly welcome the recognition of the importance of the ability of young people to plan, manage and review their learning. This should be continuously developed throughout the phase. The early development of these skills at Key stage 3 should provide an ideal foundation on which to build.
- 37 For the 14–19 phase to be successful, each child will require a solid educational foundation before this phase starts. We therefore welcome the government's focus on the earlier Key stages and particularly its keenness to raise standards and to integrate careers education and guidance effectively within Key stage 3.
- 38 In addition, we welcome the recognition of the importance of marking the end of Key stage 3 and the start of the 14–19 phase of learning. Key stage 3 could be seen as the end of the period of general basic education and we would support recognising its close through a celebration of achievement to date.
- 39 Such recognition could also help to create a sense of novelty about the new phase and allow learners to be more psychologically prepared and motivated to commence the next vital period of development. The 14–19 phase should be seen by young people as providing:
- a period of moving towards closer career definition
 - an opportunity to raise aspirations through recognition and development of particular gifts and talents

- a period of experimentation through guided choices and self-development
- access to an appropriate range of options leading to achievement of the Matriculation Diploma.

Question 3

Do you support the proposal that pupils should draw up an individual learning plan towards the end of Key stage 3 to plot how they would achieve their planned goals by age 19 (paragraph 2.7)?

Yes with reservations

- 40 We support the proposals with reservations.
- 41 Our research into the experiences and expectations of support and guidance by young people in mainstream learning² has some key messages.
- There is a need to be able to differentiate between longer-term aspirations and shorter-term goals. For many young people, 5 years is too long a period to plan for, even in the most provisional of terms. They therefore need to feel secure that the immediate choices they are taking will help them fulfil their aspirations. The achievement of short-term goals is motivating and helps to sustain momentum.
 - Young people have a strong sense of failure if they have changed course or career aim. For many young people, such changes are inevitable as they grow and develop throughout the phase. Change, where it occurs, needs to be seen as a positive experience. A written learning plan with the route even provisionally in place could exacerbate the sense of failure.
- 42 Therefore we recommend:
- drawing up a plan for the first stage in this new phase of learning, allowing the learner to hold long-term aspirations while establishing a more clearly defined pathway over a shorter, more manageable period
 - allowing the plan to be constantly reviewed and developed as the learner progresses through the phase and makes appropriate reasoned choices.

- 43 We welcome the recognition that young people should not be burdened with a range of different plans. Account needs to be taken of other wider ranging plans (such as Connexions individual development and learning plans) to ensure that all learning plans are drawn up in partnership and integrated.
- 44 We fully endorse the centrality of the learner and the support of parents, carers, teachers and Connexions Personal Advisers (PAs) in this process. Parents should be an integral part of the celebrations of success at Key stage 3. The process of drawing up the individual learning plan could also usefully provide an opportunity for them to clarify their support role over the next phase. Encouraging and ensuring the involvement of parents / carers is the responsibility of both the school and the Connexions Service.

Question 4

What support should be available to prepare young people for entry to the 14–19 phase (paragraph 2.7):

- *from the school?*
- *from the Connexions Service?*

- 45 Schools could usefully recognise the start of this phase by a range of activities and changes:
- a managed transition period starting in Year 9 and lasting well into Year 10
 - a planned induction and orientation period, involving collaborative partners
 - more flexible, individual tutorial arrangements
 - subtle changes in school rules (eg uniform requirement; accepted forms of address to teachers; more open access to school facilities such as computers) and increased responsibility for young people, reflecting the start of a transition to adulthood.

- 46 The Connexions Service, through its Personal Advisers, should be an integral part of the support structure of the school. The Personal Adviser can provide support by:
- working with individuals to identify particular individual strengths, raise aspirations and develop a career orientation
 - working with young people with particular obstacles to learning, starting at Key stage 3
 - supporting development of teaching staff skills in the provision of effective advice and guidance
 - working as a member of the school team in the development of effective transition and induction programmes
 - working with partners to ensure that communication and support channels are established between institutions providing learning for young people over the 14–19 phase.

Question 5

Would you welcome guidance on how different models of marking the start of the 14–19 phase might be developed (paragraph 2.7)?

Yes

- 47 We believe that this would be extremely helpful to schools and their partners. For those involved in the first round of Pathfinder projects, especially those focusing on Year 10, early guidance would be essential to ensure that it is viewed as the start of a new and crucial phase by staff and learners alike.

Question 6

Would it be helpful for schools to have access to a toolkit based on the approaches, materials and processes developed for Progress File (paragraph 2.7)?

Yes

- 48 Access to a toolkit such as the Progress File (particularly the first three sets of materials: *Getting started*, *Moving on*, and *Widening horizons*) could be helpful. Links could usefully be made between the Progress File as a source of evidence of achievements and the requirements of the Matriculation Diploma.

- 49 We fully endorse the principles on which the Progress File has been developed, using reflection to deepen learning and positive support mechanisms to raise aspirations, develop self-awareness, and increase responsibility for own learning.
- 50 We also welcome the recent introduction in the Progress File of materials to be used by those professionals (teachers, tutors and trainers) who will be supporting and encouraging young people to use the Progress File effectively. We note that the CD-ROM that has been produced enables staff to use the *Broadening horizons* material themselves. We strongly support this opportunity for staff to go through a similar process regarding their own personal development as this heightens awareness and improves the chances of successful adoption.
- 51 Burdensome paper-based systems need to be avoided at all costs and the medium used for the toolkit must be:
- easy to navigate
 - able to be customised
 - accessible and appropriate to both teacher / tutor and learner.
- Thus the introduction of a CD-ROM, which addresses these points, is to be welcomed.
- 52 Positive approaches that motivate and build rapport between young people and those providing support are essential to ensuring that young people buy into the process. We would therefore recommend that use of toolkit materials be accompanied by staff training to develop these motivational techniques. Establishing the right ethos and values in an institution is as essential as having rigorous systems and procedures.
- 54 Work on raising aspirations and developing expectations of progression to higher education, as the Government's Excellence Challenge Initiative recognises, needs to start much earlier and be spread more widely. The work some universities are undertaking with Years 7 and 8 could usefully be replicated to achieve greater awareness by this age group.
- 55 Effective management of transitions into, within, and out of the 14–19 phase would benefit from further development as there will potentially be greater choice, more changes, and greater access to other institutions and modes of learning in the future. Vulnerable young people need supporting through these transitions. Assessment of needs and their readiness for change should be incorporated as part of the regular review process.
- 56 Young people from more disadvantaged backgrounds who are encouraged to aspire to higher education face a number of tensions. In particular, they can find themselves isolated from friends and family who do not share these aspirations and who do not understand them.
- 57 Support is essential to help the young person understand these tensions and develop strategies to deal with them. Connexions Personal Advisers and mentoring and coaching programmes could be valuable elements of this support.
- 58 Excellence Challenge activities in working with families to familiarise them with the concept of higher education and allay fears and suspicions could usefully be replicated more widely to reduce these tensions.

Question 7

Are there any further measures that might be taken to encourage young people from groups under-represented in higher education to aim for entry to higher education?

- 53 Reductions in stereotyping and development of high expectations for all, regardless of socio-economic background, should emerge with the new opportunities for curricular flexibility and the development of individual learning plans throughout this phase.



Chapter 3

The content of the 14–19 curriculum

Question 8

Do you agree with the rationale for the 14–16 compulsory curriculum set out in paragraph 3.9?

Yes

- 59 We agree with the rationale for the new 14–16 requirements. In particular, we support the principle that compulsory subjects should allow progression across all areas of learning, avoiding the creation of pathways that depend on students having access to more than the compulsory curriculum. However, given the range of vocational options to which young people might wish to progress after 16, expectations need to be realistic.

Question 9

Do you agree that mathematics, English, science and ICT [information and communications technology] should form the core of the 14–16 curriculum?

Yes

- 60 We agree that these subjects meet the criteria for compulsory subjects. We also support the associated proposal to introduce modern foreign languages in primary school.

Question 10

Do you agree that the areas set out in paragraphs 3.12–3.14 should also be compulsory at 14–16?

Yes

- 61 We agree that these areas should be compulsory in the 14–16 curriculum and support the introduction of citizenship and work-related learning as new areas.

- 62 As outlined in the Green Paper, work-related learning could cover a wide spectrum of learning and activity, including enterprise, handling uncertainty, and risk and reward assessment. Such provision will be demanding for schools and we welcome the reference to research being carried out into effective delivery. Support through models and materials will be essential to ensure delivery of high quality provision.
- 63 We also welcome reference to the fact that many young people are already engaged in part-time work. Work-related learning in school could provide opportunities for young people to reflect on their experience of part-time work, or to develop their understanding of the sector in which they are working, for example through research. Connecting work-related learning in the curriculum with young people's real-life experience may be beneficial.
- 64 There is a danger that the introduction of citizenship as a new area could be taken to imply that it should be delivered as a discrete subject. Citizenship skills can be delivered through other areas of study, as well as through specifically designed activities.

Question 11

Do you support the proposal for the new statutory entitlement to a subject within modern foreign languages, design and technology, the arts and the humanities set out in paragraphs 3.16–3.23?

Yes

- 65 We support the concept of entitlement as a means of maintaining choice while increasing flexibility in the curriculum. We would urge however that consideration be given to extending the notion of entitlement to include an entitlement to vocational options. This would help to establish the wider range of opportunities as a right for all learners and reduce the risk of vocational options being marginalised or associated with only lower performing learners.

66 We are concerned that some schools, in practice, may only offer the compulsory curriculum and that the broader entitlement will be more theoretical than real where parental engagement is low. The reduction of the compulsory curriculum and its replacement by an entitlement therefore raises the danger of greater institutional disparity in terms of the curriculum offer. This is likely to disadvantage those least likely to demand their entitlement. While the compulsory curriculum results in efficiencies of scale, there will be logistical problems in offering small classes in entitlement subjects, which could compound this danger. (We explore the logistics involved in collaborative delivery in more detail in response to questions 35, 46 and 47).

Question 12

Do you support the changes to the disapplication arrangements proposed in paragraph 3.24?

Yes

67 We support the redefining of the curriculum and understand that current disapplication arrangements will no longer apply for the majority of students. We would emphasise it is important that the flexibility built into the new curriculum model is adaptable enough to meet the needs of individual learners with special needs.

Question 13

Do you support the extension of vocational options proposed in paragraphs 3.28–3.29?

Yes

68 We support the proposal to extend the vocational options beyond the minimum core, but we have concerns about the design of the new options. Part One GNVQs have been very successful in motivating learners at foundation and intermediate levels. We are concerned that these are being replaced by a qualification based on the structure and assessment arrangements of GCSEs, which effectively deems that those who have achieved at foundation level have failed. We therefore recommend that GCSEs in vocational subjects should be developed with an assessment methodology which is appropriate to the distinctive skills and aptitudes being developed and which positively recognises success at both foundation and intermediate level.

69 We strongly recommend that assessment designed for academic study should not be imposed on applied areas of study. Assessment must be appropriate to the learning taking place and parity of esteem will not be achieved through imposing the same assessment methodology. We explore this issue further in response to question 16.

Vocational relevance

70 To implement the new GCSEs in vocational subjects successfully links with employers and their support and commitment are necessary to ensure vocational relevance. This will present many challenges. Based on past experience, small and medium-sized enterprises (SMEs) and micro businesses are difficult to engage in the process of education and training. Employer engagement is important not just from the student's perspective – ie provision of placements and work experience – but also to support the learning process directly and provide opportunities for teachers to develop and maintain their work-related knowledge.

Breadth in work-related study

- 71 Although 14 year olds may benefit from work-related options, early specialisation should be avoided. Breadth of study for those who undertake predominantly vocational learning is as important as it is for those who follow academic study. Choice of work-related study should not commit a young person to a single sector or vocational area. Young people must have opportunities for discovery and experimentation as part of a broad curriculum.

Progression issues

- 72 Equally, entry to apprenticeship at 16 should be open to any student, and not just to those who have completed vocational programmes. This implies that the apprenticeship programme itself is flexible enough to cater for those with preliminary awareness of (or skills in) the vocational area, as well as to those for whom it is new.
- 73 In addition, progression may be horizontal – to other subjects at the same level, as well as vertical – to higher levels of study. For example, a young person achieving at Level 2 in the general pathway may benefit from progression to vocational or work-related studies also at Level 2. The same is true at Level 3 or beyond. Horizontal progression, before further vertical movement, may be the most appropriate option for the individual, particularly as part of a planned route for a learner to achieve appropriate work-related learning opportunities.
- 74 We support the view that young people with physical disabilities and sensory impairments should have access to vocational opportunities and would suggest that one way to progress this further would be a closer relationship between providers delivering the forthcoming Entry to Employment programmes and local schools. We suggest, however, that this should apply equally to young people with emotional and behavioural difficulties and with moderate learning difficulties, as well as those with dyslexia.

Question 14

Do you support the development of hybrid qualifications as proposed in paragraph 3.30?

Yes

- 75 We welcome the proposal to develop GCSE specifications to a common core and optional general or vocational units. Such flexibility could offer greater choice, enable units to be updated rapidly and enable links to be made between vocational curricula and underpinning knowledge. We believe that a fully unitised framework should be a medium-term goal for reform of GCSEs. We explore this further in response to question 16.

Question 15

Do you agree that in future all GCSEs should be called simply that (paragraph 3.31)?

Yes

- 76 We are in favour of a single title and agree that the content should be conveyed through the subject title. In addition, we suggest that care is needed in the use of the term 'vocational'. In the post-16 sector, the term 'vocational qualification' is associated with occupationally specific skills and the capacity to carry out a work role, which is quite distinct from the kind of pre-vocational and vocationally relevant skills and understanding being developed in programmes designed for 14–16 year olds. In light of the government's wish to strengthen vocational education in the post-16 sector through programmes such as the Centres of Vocational Excellence, terminology should be used with care.

Question 16

Are there other ways in which you think GCSEs might evolve?

- 77 We believe there are significant weaknesses in the GCSEs as currently designed.
- First, learners who achieve at foundation level (grades D–G) are deemed to have failed.
 - Second, for learners to progress from foundation to intermediate level, the only option is to retake the entire award. This is highly demotivating for learners and success rates are very low.

- 78 These weaknesses in the GCSE structure must be addressed if achievement is to be improved significantly above current levels.
- 79 We recommend that to address these weaknesses, the award should be developed into a unit-based structure with units achievable at both intermediate and at foundation level. To increase the flexibility, we recommend that assessment is primarily internal, with external moderation, to enable learners to progress at their own pace and to promote greater integration of assessment with the learning process. Learners could build up units, whether applied or academic, towards their GCSEs at foundation and at intermediate level.
- 80 We acknowledge that public confidence in assessment is vital to the credibility of qualifications. Therefore, the reform process needs to ensure this is maintained. Reliability of internal assessment will rest on consistency of teacher judgements. To move safely to internal assessment, staff development and support materials should be in place.

Question 17

Do you agree that more opportunities should be provided at A-level for the most able students to demonstrate greater depth of understanding (paragraphs 3.36–3.39)?

Yes with reservations

- 81 We agree that opportunities should be available for able pupils to develop greater depth of understanding in areas where they have particular talent. We recommend later in this response (chapter 5, Q35, paragraph 132), that reform to A-level structure should be considered, to create a more flexible unit-based structure. This structure would facilitate availability of units at a higher level for those wishing to progress further.
- 82 In broad terms, however, we believe that the policy priority should be to improve the provision and opportunities available to lower achievers, rather than higher achievers. While we recognise the government's concern to achieve its target of 50% of 18–30 year olds accessing higher education by 2010, we suggest that this will not be reached simply by focusing attention on those of higher ability.

Question 18

Do you agree that the existing grade range at A-level should be extended to provide greater differentiation between more able candidates (paragraphs 3.36–3.39)?

No

- 83 While we appreciate that talented young people should have an opportunity to demonstrate their talents, we do not agree that the grade range should be extended. Results at AS and A2 already show the actual marks that students achieve when they take the units so there is no obvious advantage to adding a grade descriptor when marks are already seen.

Question 19

Do you agree with the proposal to introduce more demanding questions into A2 papers so as to produce a higher grade at A-level (paragraphs 3.36–3.40)?

No

- 84 We disagree with this proposal. The new A2 examinations have yet to be taken by the first cohort of young people and it is important to get the standard of the existing A2 established as a consistent indicator of ability, rather than adding more demanding questions.

Question 20

Do you agree with the proposal to re-label vocational A-levels in paragraph 3.41?

Yes

- 85 As with GCSEs, we support removal of the vocational label from these qualifications. However, we believe that there are weaknesses in the existing framework, beyond titles, that need to be addressed to improve choice and flexibility.
- 86 Most importantly, we consider that the distinctive learning style of the AVCE requires a distinctive assessment regime to recognise skills and achievements that are different to those developed through the AS/A2. We note that since its original conception as advanced GNVQ, the assessment model has moved towards that of the A-level, depending increasingly on assessment through examination.

The original assessment model, which included substantial portfolio evidence and internal assessment, was more appropriate for measuring the applied and practical learning style and learning outcomes of these programmes.

- 87 We believe that this change in the assessment model has undermined the distinctive and alternative nature of this pathway. As noted in our response to question 13, we also fear the loss of a distinctive applied pathway at intermediate and foundation levels. It is vital that an alternative, more practical and applied route is available through to advanced level.

Question 21

Do you agree that all young people aged 16–19 should be entitled to continue studying literacy, Numeracy and ICT until they have reached Level 2 (paragraph 3.43)?

No

- 88 We strongly support an entitlement for young people aged 16–19 to continue to develop their key skills beyond Level 2 and not just up to Level 2, as the paper proposes. If the entitlement is only up to Level 2, it is effectively only a remedial entitlement to the basic skills, which most school-leavers will have achieved by Key stage 4. This is therefore a very limited aspiration that does not go beyond basic employability. The route through to Levels 3, 4 and 5 is very important as an entitlement for young people.
- 89 However, we believe that the relationship between key and basic skills is unduly complex. We welcome the ongoing work to develop the relationship between them and suggest that there is a growing need for clarification. We would support ICT being designated a basic skill, and basic and key skills being brought into a single framework (preserving best features of the current models such as Entry level). Given that external assessment of basic and key skills in Application of Number and Communication are now consistent at Levels 1 and 2, we believe there is a strong basis for a single framework, with a single title. This would provide a simpler platform from which to determine equivalence with GCSEs. Currently the specifications for the Diploma are complicated by the complexity of relationships between these different awards.

Question 22

Do you support the framework proposed in paragraph 3.44?

Yes

- 90 We support the framework and the notion that a post-16 curriculum should not be so narrow or shallow as to pose progression or employment problems for individuals. The design of the new generation of Modern Apprenticeships, including as it does NVQs, technical certificates, key skills and on-the-job experience, acknowledges this.
- 91 Since opportunities for apprenticeship depend on employer demand for apprentices, there is no guarantee that young people will have access to the apprenticeship they prefer. Even the programme-led apprenticeships proposed in the Cassels reforms³ will not guarantee a place for all young people. Variations in labour market trends over time and between localities need to be accepted as contingencies in any overall programme or curriculum structure.
- 92 Given the unpredictable nature of the demand for apprentices we believe that there needs to be adequate breadth and depth of provision in the post-16 curriculum for those studying outside a formal training framework. We believe that the capacity of the LSC to fund coherent programmes of study will be more helpful to learners and to institutions than previous arrangements that funded units.
- 93 At the same time, in recognising that young people develop at different rates and have individual needs and commitments, we believe that it should be possible for them to learn on a part-time basis in the 16–19 years if they so wish, with no compulsion to be attached to a framework.
- 94 As we argue in our opening comments (paragraph 17), it will be important to accommodate young people's aspirations and lifestyles with the range of options available. Many young people are in fact studying part-time (for example, single AVCE programmes and 2 A-level programmes are not uncommon) yet the notion of part-time study is not normally associated with 16–19 year olds and is not reflected in the vision described by the government.

The possibility that increasing numbers of young people could be motivated to continue their education by combining it with substantial part-time work should not be ignored. Encouraging young people to stay in learning through the 14–19 phase does not have to require full-time enrolment.

Question 23

Do you agree that we should expect all young people to participate in active citizenship, wider interests and work-related learning (paragraphs 3.49–3.50)?

Yes

- 95 We support the implied entitlement suggested by this expectation that young people will participate in active citizenship, wider interests and work-related learning. We suggest that this should be presented as a clear entitlement, establishing that all providers have a duty to make this available, either themselves or in partnership with other providers. This would reflect the position relating to 14–16 year olds, providing a more consistent offer.
- 96 We support the definition of citizenship as set out in both Crick reports.⁴ This suggests a three-stranded approach of social and moral responsibility, community involvement and political literacy. However, the Green Paper could be read to suggest that volunteering alone would suffice.
- 97 We welcome the commitment that all young people should undertake some work-related learning. This should include not only direct experience through work and community placements and, indeed, part-time jobs, but also learning about the world of work through vocational courses and enterprise activity as suggested for 14–16 years olds. (3.14). Our comments in relation to question 10 (paragraphs 62–64) apply equally to the 16–19 age group.

Chapter 4

Recognising achievement – a new Diploma for Achievement

Question 24

Do you agree that there should be a new overarching award to recognise achievement by the age of 19 (paragraph 4.2)?

Yes

- 98 The idea of an overarching certificate, graduation diploma or baccalaureate has been proposed in various forms for more than a decade. We welcome a fresh look at this proposition in the Green Paper. We believe there is a strong case for developing an overarching award that could be the focus for the whole phase of 14–19 education, encompassing learning at school, college and in the workplace.
- 99 Our support for an overarching qualification is based on the view that :
- it will encourage and motivate young people to engage in wider activities and provide recognition of these
 - academic and vocational achievement will be valued in the same way, and come under a single award
 - it has the potential to encourage increased participation post-16 and to raise aspirations and achievement
 - such an award can provide a clear framework without detailed prescription allowing for variety and flexibility to suit individual strengths and interests.
- 100 The Diploma represents a major change from a post-16 education system that first developed as an entry route to higher education for 3–7% of the population. What is now proposed has the potential to recognise and encourage a much wider range of achievement at 14–19.

- 101 However, the proposed Diploma maintains a voluntarist approach, and we are concerned that this could undermine its currency with learners, teachers, employers and higher education. The model also appears to be a 'wrap-around' of existing qualifications. Retaining these component qualifications unchanged could ultimately prevent the award from becoming a pivotal feature of the 14–19 phase, as the government intends.
- 102 To foster change and mark a clean break with the past a less voluntarist model would be required. However, we would suggest that recording achievement of the award in performance tables could be a powerful lever for encouraging its take-up by institutions and learners. In addition, while we would not wish to devalue existing qualifications in the short term, we suggest that there is scope, in the longer term, to develop a stronger, more prescribed award model, based on a more flexible unitised framework. Involvement of employers and higher education in the design of the award and a sustained marketing strategy to 'sell' the Diploma will be key, so that its currency among all end-users is established at the outset and maintained.
- 103 We note with interest the implementation of a baccalaureate in Wales, underpinned by a credit framework. It will be important to monitor the impact of the approach in Wales to inform evolution of the English model. (We discuss this further in our response to question 30 at paragraph 116).

Question 25

Do you prefer the model for the Matriculation Diploma outlined in paragraphs 4.8–4.15 or for a Certificate as outlined in paragraph 4.16?

- 104 We prefer the model of the Matriculation Diploma model to the Certificate. We doubt that the Certificate model would achieve any or all of the purposes stated in paragraphs 4.2–4.6.

Question 26

What do you think that the award should be called (paragraph 4.3)?

- 105 The term 'matriculation' will not support efforts to market the Diploma. Matriculation is associated with the academic route in the 1940/50s and is not a good starting point for an award that is supposed to be inclusive of all types of learning and fit for the 21st century.
- 106 'Graduation Diploma' runs the risk of being confused with HE graduation, but it does have the advantage of having currency with young people who are aware of its place in the US system through TV, film and literature.
- 107 We therefore recommend that there is further consultation on titling, setting the Matriculation Diploma within the context of other 'brands' such as Modern Apprenticeships or A-levels so that an overall coherent set of titles is established.

Question 27

Do you agree with the structure for the award that includes a common strand and main qualifications (paragraph 4.8)?

Yes

- 108 We welcome the proposed structure for the award, including as it does a requirement for core achievement and wider activities in addition to existing qualifications.
- 109 Work carried out in 1999 by LSDA (then FEDA) with the Institute of Education for DfES, QCA and the equivalent regulatory bodies in Wales and Northern Ireland (ACCAC and CCEA) proposed a model for an overarching award at Advanced level. A key feature of the proposal was for an integrative project that would draw together learning from across different elements of the learners' programme. We believe that such a model has merit in promoting integration of learning and should be considered as a further feature of an advanced-level award.

Question 28

Do you agree there should be a record of progress for those who do not gain the Intermediate award (paragraph 4.9)?

No

- 110 We recommend that the award be made available at foundation level, as explained below (Q29). There is a danger that the record of progress will be perceived as a badge of failure and demotivate lower achieving young people.

Question 29

Do you agree with our proposal that the Diploma should have three different levels (paragraph 4.10)?

Yes with reservations

- 111 The Matriculation Diploma should offer a ladder of achievement for all learners. Without a Foundation award the first rung on the ladder is missing. Even though the aspiration may be that all learners achieve at least intermediate level by 19, it remains likely that significant numbers will not do so (as the government's learning targets bear out).
- 112 At least in the transition phase, a foundation level will be required for learners who have not benefited from having the right start and appropriate options at 14. We recognise that we must be careful that the Foundation award does not become a sufficiency model born of low expectations and the acceptability of low achievement. However, we believe that the Foundation award would help to ensure that the new Diploma system would not label a significant number of young adults as failures at 19. This aligns with our proposals about reform of the GCSE, detailed in response to question 16.
- 113 We are not convinced that a Higher award is needed. We suggest that this should be considered once awards are established at the existing levels within the qualifications framework – Foundation, Intermediate and Advanced.

Question 30

Do you agree with our proposals for main qualifications thresholds for the Intermediate, Advanced and Higher Diplomas (paragraph 4.10 and diagram 1)?

No

- 114 We have some concern about the proposed threshold for the Advanced-level award, preferring the threshold at 2 A-levels rather than 2 A-levels plus an AS level. In the short term it will be important to establish the Diploma within the system as the outcome achieved by the majority of advanced-level students. This will be supported by keeping the requirements as close as possible to existing thresholds for progression to higher education. As a stronger model is developed in future, it may be appropriate to shift the thresholds.
- 115 The levels used are benchmarked against existing general / academic qualifications. Equivalences will need to be developed for a range of qualifications and units in order to provide a stable measure of volume and operationalise the system. They will need to be developed on a rigorous and reliable basis to give the system currency and ensure it includes a wide range of achievement (and learners).
- 116 If a stronger model of the Diploma is developed in time, it may be appropriate to specify thresholds in terms of credits / points rather than clusters of qualifications. Such an approach, which is being implemented in Wales, could encompass all relevant units and qualifications, would be more flexible and could be adapted and developed to meet learner needs and address changing national priorities.
- 117 The suggestion that NVQ Level 4 should be part of a higher award introduces potential confusion about levels. The higher the levels of NVQ, the less likely it is that anyone in the age range 14–19 will have the opportunity to work towards or achieve them. We would suggest, rather, that there should be a clearer expectation for vocational or vocationally related qualifications at the equivalent NVQ level to lead to award eligibility.

118 To raise the status of vocational and work-related options, they must have a clear fit with the Diploma alongside academic qualifications. It is important therefore that at Level 2, qualifications other than GCSEs and the Foundation Modern Apprenticeship should be considered as valid in their own right, and contribute to achievement of the Intermediate Diploma if accompanied by the Common Strand and Wider Activities. Similarly vocational qualifications at Level 3 should count towards the Advanced Diploma. This will also be important for achieving equality of opportunity, particularly in situations where the local employment situation may be (perhaps temporarily) too weak for apprenticeship arrangements and learning takes place outside a framework.

119 Nevertheless it is also important to note that delivery of NVQ at Level 3 requires formal workplace arrangements or elaborate substitutes which are increasingly unlikely to be sustainable outside an apprenticeship framework. The apprenticeship framework will be the optimum context for working towards vocational qualifications for many young people.

Question 31

Should General Studies A/AS levels count toward the thresholds for the Advanced and Higher Diplomas (paragraph 4.11)?

Yes

120 As long as General Studies is an approved A-level and therefore represents the same level of demand as other A-levels, we believe that it should count towards the threshold.

Question 32

Do you agree that the Diploma should have a common strand of attainment at Level 2 of literacy, numeracy and ICT (paragraph 4.12)?

Yes

121 We welcome the expectation of core attainment at Level 2 in English, maths and ICT, but would recommend that a greater variety of qualifications at that level be recognised. For example, maths could also include the freestanding maths units as well as Application of Number. Differentiation of maths coverage is currently not clear through the GCSE system and this would help clarification.

122 We are disappointed that the language used in the paper promotes basic rather than key skills. We would also argue that for a higher award, at least one key skill at Level 3 should be required, reflecting the government's current expectation that young people aiming to enter university or advanced training should achieve at least one key skill qualification at Level 3.

Question 33

Do you think wider activities should be required for the achievement of the Diploma (paragraph 4.13)?

Yes

123 We support a requirement for wider activities within the 14–19 curriculum and within this award structure. Such activities form a significant part of young people's learning and maturation and we believe that their inclusion will raise the confidence and motivation of learners.

Question 34

How do you think the wider activities should be assessed (paragraph 4.14)?

124 Assessment of wider activities holds the danger of constraining them in two important ways:

- first, the range of activities which it would be desirable to include within the award might be limited if activities had to be amenable to assessment.
- second, the kind of activity that young people / learners choose might be constrained by the idea that it would involve assessment.

125 We would therefore not support a requirement for wider activities to be assessed. Where there are existing structures for assessment (such as the Wider Key Skills assessment or the Duke of Edinburgh Award) these could be used, but we do not believe that the government should seek to find ways of assessing all wider activities for the purpose of the award. If an integrative project / unit (as described in paragraph 104) were part of the Diploma, then this might also offer a means of capturing the benefits of wider achievements.

126 We suggest that further work needs to be carried out to explore the options for recognition of achievement in this strand.



Chapter 5

Pace and progression

Question 35

Do you support our proposals for ensuring that young people should be able to progress at a pace consistent with their potential and abilities?

Yes with reservations

- 127 We support the principle that young people should be stretched throughout their education and, as far as possible, progress at a pace consistent with their abilities. The pace of progress needed will vary between young people, and individual young people will be capable of progressing at a different pace in different curriculum areas.
- 128 However, we believe that young people can equally be stretched through increased breadth, and would strongly favour breadth over acceleration. The emphasis on wider activities and breadth within the proposed entitlement for 14–16s, reflected in the proposals for the Matriculation Diploma, promises increasing opportunities for young people to be stretched through breadth of study and wider activities.
- 129 It is important that, in the pursuit of academic achievement, we do not lose sight of the less tangible, more social aspects of education, and the importance of relationships with peers in the personal development of young people. The danger of encouraging more able learners to progress significantly faster than their peers is that they lose their relationship with their cohort, arguably sacrificing wider social and personal benefits for academic achievement. Young people need the social, personal and wider key skills to be able to integrate effectively into a variety of contexts and to cooperate successfully with others. A purely academic diet may not be the best way of achieving this.
- 130 We do not support the proposal that some young people should be able to skip GCSE to avoid delay in their learning, while others have to take exams. The stage of learning measured through GCSE needs to be passed through by all learners and the assessment regime should be capable of marking this without disruption to the learning process. However, current arrangements require young people's learning to fit with a rigid external assessment timetable. Because of the large number of subjects studied at GCSE, this results in a challenging period of examinations, which is stressful for young people and does not promote optimum performance.
- 131 We recommend earlier in this response (Chapter 3, question 16, paragraph 79) that GCSE be reformed into a unit-based structure with units achievable at both foundation and intermediate levels. We also recommend that they should be internally assessed with external moderation. This would introduce much-needed flexibility into the system and allow learners to build up achievement and progress over the 14–16 phase.
- 132 In the medium term we recommend that consideration be given to similar reform to the A-level design and assessment arrangements in order to create a single qualifications structure for the 14–19 phase, culminating in an overarching award, built from modules or units at different levels. Such a system would truly allow young people to build up their achievement flexibly and systematically according to their capacity.
- 133 Overall we believe that the most significant challenge for a 14–19 strategy is not to accelerate the pace of the most able, but to ensure that there are appropriate opportunities for those who progress more slowly and whose achievements are modest. In our view these learners are least well served in current arrangements.

Implementation issues

- 134 There are significant operational challenges and logistics involved in delivering significantly increased flexibility in the pace of learning for young people even where the young person remains with a single provider. Individualised programmes that relate to the pace of a young person's learning will have implications for:
- timetabling, classroom management and class size
 - tracking and supporting progress and achievement
 - provision of individualised learning materials
 - skill development for many teachers in new approaches
 - ensuring adequate progression opportunities are available.
- 135 In circumstances where young people need to move between institutions, there will be additional complexities. While a school may arrange for provision to be available through partner schools or colleges, young people may not be prepared to move between institutions to obtain their full entitlement. In addition, parents may not be comfortable with such arrangements. Real mobility between schools and colleges of both students and teachers is likely to take time and resources to establish and will create significant operational challenges.
- 136 For collaborative delivery to become a reality and for its operation to be smooth, models and approaches to handling practical issues need to be developed and tested. We suggest therefore that the pathfinders pay particular attention to the following:
- implications for advice and guidance
 - joint curriculum and timetable planning
 - tracking learners' achievements and mapping progression opportunities across institutions
 - practical problems of travel and associated downtime for teachers and for learners
 - costs and institutional overheads (see our response to questions 46 and 47 for comments on costs).

- 137 We recommend that the pathfinders explicitly develop practice in these areas and that systematic support be available to develop the capacity of providers to handle such flexibility appropriately.

The potential of ICT

- 138 We agree that careful use of technology could potentially enhance the capacity of teachers to enable young people within a single group to progress at more differentiated rates, and thus facilitate the flexible pace and progression that the Green Paper envisages. In addition, ICT may allow link ups between institutions to reduce the need for physical movement of students and staff between institutions.
- 139 However, developments will need to take account of the pedagogical implications of using ICT. New teaching styles will need to be developed, tested and adopted before technology can be fully exploited in mixed pace learning settings. Exploration through the pathfinders of the practical possibilities and economic implications of using ICT in these ways should inform a strategy in this area.



Chapter 6

Advice, guidance and support for young people

Question 36

Do you support the proposed focus of the national specification for careers education and guidance described in paragraph 6.7?

Yes

- 140 We welcome the proposal to develop a new national specification for careers education and guidance (CEG) alongside PSHE and Citizenship at Key stage 4.
- 141 Young people need to be able to make effective choices and navigate their way through a wide range of opportunities in the 14–19 phase. To do this they need a growing awareness of their own potential and future roles, and the ability to make effective decisions with regard to their own lives. We would welcome the creation of an entitlement to personal development throughout this phase that required an integrated approach comprising the new specification for CEG, PSHE, Citizenship, enrichment activities and pastoral support.
- 142 We would therefore hope that the new CEG specification would span the whole of the 14–19 phase and include:
- understanding the role of work – individual / family / community
 - understanding the labour market – sector skills, opportunities
 - developing transferable employability skills
 - careers management – including periods of unemployment or inactivity
 - exploring and raising aspirations
 - developing an understanding of own preferences and strengths
 - exploring preferred choices and progression routes
 - retaining flexibility for changes of mind and other paths to be followed.

- 143 It is important to recognise that not all young people will be ‘career-sure’ by the time they reach 19. Young people should be encouraged to explore possibilities and develop new interests as they progress through the phase. All young people need to be catered for, from those who are career-sure at a very early age to those young people who, at 19, have still not fixed on what they want to do.

Question 37

Do you agree that it should begin from Year 7, with a very light touch in the early years of Key stage 3?

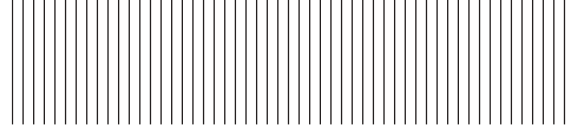
Yes

- 144 We agree that CEG should start early and that a very light touch at that stage is essential. It should be of a very general nature and integrated wherever possible with the curriculum to avoid categorisation of young people and their career potential. Early stereotyping and labelling often result in lowered aspirations.

Question 38

Are there other ways in which Connexions Personal Advisers should provide support to young people in the 14–19 phase (paragraphs 6.8–6.10)?

- 145 The integration of support roles in different institutions is essential to achieving cohesion and continuity for individual learners. Connexions partnership agreements (6.10) should be the result of a process of service design, need identification and negotiation.
- 146 All partnership agreements should clearly provide a support service for all learners, flexible enough to provide both long-term and short-term support, ranging from one-to-one intensive to more general support.



Chapter 7

Drivers and support for change

- 147 The proposals contained in the Green Paper put support and guidance as a crucial, central service to be accessed by all young people. Research with young people on their support and guidance experiences and expectations⁵ concludes that the best way to raise young people's aspirations is to establish a support service that is stigma-free. Seeking guidance and support needs to be seen as normal, rather than the exception when there is a problem. In this way a positive focus on preventing disengagement will be possible.
- 148A few colleges are branding the whole of their student services as Connexions, creating an integrated, all-embracing service. We strongly endorse this approach, which, together with the proposed extension of Connexions Direct as a nationally accessible 24-hour service, allows the creation of a seamless support service which is flexible and responsive.
- 149 Specifically, additional activities by Personal Advisers might include :
- complementing the work of tutors in promoting higher aspirations, especially with those who are being encouraged to move out of their traditional context, such as through the Excellence Challenge Initiative
 - bringing together other agencies and initiatives with an interest in raising aspirations and achievement in young people, such as coaching and peer mentoring schemes, community projects, sex and health education initiatives
 - training and support for teaching staff, particularly in the development of specific support techniques.
- 150 We welcome the commitment to a vision of high-quality, diverse provision across the 14–19 age range, expressed in paragraph 7.1 of the Green Paper. Equally, we support the stated determination to remove any possible barriers that might deter institutions from offering young people a range of learning pathways. In order to achieve these goals, we believe that targets and performance measures should be designed so that :
- they capture the widest possible range of learners' achievements
 - they provide valid indicators of 'distance travelled' by learners (that is, they incorporate measures of value added).
- 151 Inadequate understanding of or attention to these features is likely to distort the behaviour of individual schools and colleges, at the expense of those learners who need the greatest support. If certain types of achievement are not recognised, then providers will be discouraged from catering fully for the students concerned, or will feel that they have been treated unfairly if they do so. Likewise, performance tables that encourage media and public to rank providers according to 'raw' achievement rates, unadjusted for value added, lead to unfair comparisons and are thus a disincentive to the enrolment and retention of learners with low prior attainment and / or behavioural difficulties.
- 152 Our responses to the specific questions relating to this chapter of the Green Paper are made in the context of the principles articulated above.

Question 39

Do you support our proposals for extending the qualifications included in the performance tables (paragraphs 7.10–7.15)?

Yes

- 153 We strongly support the intention to move progressively towards the inclusion of a full range of vocational qualifications within the performance tables, so that those taken by 16 year olds will be counted on an equivalent basis to GCSEs and GNVQs from 2003 onwards, and those normally taken at 17 or 18 will be included from 2004. If vocational qualifications are to play their intended role in contributing to individuals' acquisition of skills, and providing the nation with a qualified workforce, then it is vital that as much as possible is done to ensure that they are given proper recognition. As stated in paragraph 7.14 of the Green Paper, this requires that schools and colleges receive full credit for all the qualifications they enable their students to achieve and not, as now, merely some of them.
- 154 We would stress the importance of ensuring that achievement within Modern Apprenticeships is recorded in the performance table. The Green Paper is currently unclear about this, even though their value is recognised in chapter 3.
- 155 One issue not addressed in the Green Paper is that of recognition for joint provision of the curriculum between schools and colleges. In future an increasing number of 14–16 year olds will attend college for part of their studies – towards vocational GCSEs or other vocational qualifications. Colleges are unlikely to be encouraged in their commitment to the success of these arrangements if they do not receive any recognition in the performance tables for their contribution to the achievement of the young people concerned.

- 156 As they stand, the performance tables draw undue attention to individual institutions, while not presenting data on area-wide or partnership performance – issues that are also of concern to the fulfilment of the government's educational targets. We therefore suggest that area-based data should be introduced, based on LSC boundaries. While we acknowledge that school and college catchment areas span LSC boundaries, given that all LSCs will have similar boundary issues, we believe that such data would nonetheless provide a useful measure of performance across areas.
- 157 Finally, to promote the proposed Matriculation Diploma, we urge that this should also be included in performance tables, and that the government's intention to do so should be announced as early as possible.

Question 40

Do you agree with our proposals for recording the performance of AS (paragraph 7.19)?

Yes

- 158 The proposal to count the achievement of AS before age 16 within the secondary school tables from 2003 primarily concerns provision outside our post-16 remit. Nonetheless, we support this intention as being consistent with our view that the widest possible range of learner achievement should be incorporated.

Question 41

How would you propose that the performance tables deal with achievements of those who take GCSE or equivalent qualifications up to a year later than age 16 (paragraph 7.20)?

- 159 In line with the principles that we feel should guide the design of the performance tables, we suggest the inclusion of a measure of learners taking Level 2 qualifications, at least up to a year later than age 16, and preferably up to 19. It is important to recognise that some young people may quite sensibly undertake Level 2 qualifications at 18 or 19 – not because they have failed previously, but because they have engaged in a 'lateral progression' suited to their personal learning and career aspirations. The achievement of these types of learner needs to be recognised.

Question 42

Do you support the proposal to change the performance indicators for schools and colleges at age 18 to reflect achievement of Levels 2 and 3 (paragraph 7.23)?

Yes

- 160 We welcome the proposal to focus on the percentage of students achieving qualifications at Level 2 (intermediate) or Level 3 (advanced), and to report the new indicators alongside the existing point score indicators, to provide a rounded picture of institutional performance. Though not mentioned explicitly within this chapter of the Green Paper, we also strongly support the progressive introduction to the tables of measures of value added, as indicated in the recently issued DfES consultation document *Publication of school and college performance tables in 2002*. Taken together, we believe that these steps will do much to assist end users' valid interpretation of the tables by facilitating fairer comparisons.
- 161 We do have concerns, however, about one aspect of the proposal as it appears. Paragraph 7.22 states that 'the focus is on the percentage of students who *complete a two-year course of study* and who as a consequence attain qualifications at either Level 2 or Level 3' (our italics). This implies that achievement will not be recognised in respect of any learners who leave school or college before the end of 2 years, but having nevertheless acquired qualifications during the time they were on-course.
- 162 Although we support incentives to institutions to retain learners until normal course completion dates, it does not seem sensible to exclude from the tables real achievements in the meantime, especially as many learners will have achieved AS qualifications after 1 year of study. For some learners, it may be a legitimate and sensible decision at that stage for them, say, to enter full-time employment while they study towards a vocational qualification at Level 3 or Level 4. Others may not require the whole of a 2-year course to achieve qualifications at Level 2 or Level 3. A coherent course of study may comprise a number of qualifications, sometimes involving different levels. Institutions should not be penalised in the performance tables for facilitating that kind of appropriate choice.

Question 43

What further measures would help to support improvement in the FE sector (paragraphs 7.33–7.38)?

- 163 We support the intention to raise standards of educational attainment, and welcome the recognition that FE colleges are fundamental to the delivery of the proposals contained within the Green Paper. We agree that sustained endeavour is needed to raise standards in colleges.
- 164 Through the work of the Raising Quality and Achievement Programme⁶ and a range of other LSDA professional development activities we have developed a good understanding about what works to improve quality.
- 165 There are key messages from this evidence base.
- The need for substantial improvement in the quality of leadership in the sector, specifically the quality of those aspiring to college leadership, the effectiveness of the selection process by governors and the in-service training of principals.
 - The importance of institutional 'ownership' of the quality improvement process: there is some concern that the extent of external regulation and review arrangements could discourage institutions from taking ownership and responsibility for raising standards.
 - The significant impact of institutional ethos, systems, procedures and practices on student achievement. In particular the relationship between teachers and learners. Evidence⁷ indicates that, at the most, differences in the characteristics of the student intake can account for only half of the differences in levels of achievement between the best and worse achieving colleges.
 - The importance of raising staff morale, given the strong positive correlation between some aspects of staff satisfaction and student satisfaction. Evidence⁸ indicates that staff satisfaction is likely to be influenced by a clear sense of institutional purpose.
- 166 While we recognise that there is much that can be done to raise standards in colleges, however, we would equally stress the importance of the context in which colleges are operating. Colleges need clear definitions of measures of success and to work closely with the Local LSCs to set targets for improvements. Funding incentives linked to achievement of improvement targets could be a powerful device to drive improvement.

Chapter 8

Implementation

Question 44

Do you agree with the timetable indicated (Appendix 1)?

No

- 167 On balance we feel that the timetable may be ambitious. It is important to learn the lessons of over-hasty implementation, and to ensure that adequate time is available to take on board evidence from evaluation of the pathfinders. The pathfinders will be testing out complex implementation issues such as collaborative delivery between institutions, within the context of existing reforms and the emergence of the LSC network with its new role in planning and funding post-16 learning.
- 168 The scale of systems change and the complexity this creates for evaluation should not therefore be under-estimated. It will be critically important to have criteria against which to evaluate practice, and a clear specification of research questions that need to be answered through the pathfinder stage.
- 169 In addition, we recommend that a very detailed analysis of the costs of national roll out need to be carried out during the pathfinder phase to inform plans for roll out. (We explore this in more detail in response to question 46 below.)
- 170 Given the level of complexity and the timescales proposed, adequate opportunity for feedback from the pathfinders to inform roll out in 2005/06 must be a priority.
- 171 There is also a danger that, given the scope of the Green Paper consultation, the government may not be given a clear agenda for detailed reform. We therefore urge the government to view this consultation as the first stage of a longer process of engaging key stakeholders, including employers and higher education as well as the general public and young people themselves, in developing a detailed long-term model for change. This needs to be factored into the timescale for implementation.

Question 45

Do you support our proposals for pathfinders (paragraphs 8.7–8.10)?

Yes

- 172 We welcome the proposals for pathfinders, and in particular their emphasis on:
- testing a range of ideas and new models
 - identifying and overcoming barriers
 - looking at the financial implications.
- 173 A key issue in our view will be to ensure that there are clear links to other, already-planned developments in the curriculum such as:
- increased flexibility 14–16 programme
 - post-16 citizenship development projects
 - Progress File development projects and roll out
 - Key Skills Support Programme.
- 174 All these strands have a significant impact on the 14–19 curriculum and developments should be linked. For example developments in the wider activities strand of the Matriculation Diploma cannot be fully explored without reference to the experiences and lessons learnt from the post-16 citizenship and key skills development. In addition, the implications of Howard Davies' recent report *A review of enterprise and the economy in education*⁹ need to be taken into account.
- 175 As the paper indicates, collaboration between organisations will be more established in some areas than in others, and will face distinctive development needs. The extent to which employers are involved will vary – for example, in economically disadvantaged areas, whether urban or rural, there may be few large firms, therefore learning providers will have particular difficulties in developing sufficient links with employers. The level of collaboration between the school / college sector and the private provider network will also vary greatly. Voluntary and community-based organisations may be learning providers in their own right, or have potential to contribute to learning pathways for 14–19 year olds (for example through work experience). Rural areas are likely to have distinctive problems of location and travel to resolve.

- 176 The 101 Learning Partnerships have made progress in developing collaboration between providers, across phases of learning and with other local organisations. Though their overall impact has been variable, their success in promoting provider collaboration was recognised in the recent Ministerial review, which redefined this aspect of their work as one of the two new 'core roles' for Learning Partnerships. Some Learning Partnerships have already been active in responding to the 14–19 Green Paper proposals. The Learning Partnerships therefore have the potential to stimulate and strengthen collaboration on the development of coherent learning pathways for 14–19 year olds.
- 177 These factors reinforce the value of testing different models of partnership and establishing best practice. All the lessons from partnership working demonstrate that partnerships need time and support to evolve – they do not become successful overnight, hence the importance of building in sufficient lead-in time for a national roll out.

Question 46

Are there aspects other than those mentioned which should be covered by the pathfinders?

- 178 We welcome the emphasis on the range of organisations that need to be involved in the pathfinders. We support, in particular, the intention to gather evidence through the pathfinders on the financial implications of the proposals. We consider it vital that this aspect is explored in detail in advance of full roll out. There are management and cost implications associated with offering increased choice of programmes, with enabling acceleration and with delivering more individualised programmes within a single institution. (See further detail in our response to Chapter 5, question 35.)
- 179 There are also additional management and cost implications associated with delivering these new opportunities through collaboration between providers. These relate in particular to complex issues of apportionment of costs and diseconomies of scale. Essentially, if a school transfers students to a college for a day or so per week, there are minimal economies associated with teaching time, unlikely to be sufficiently sustained or substantial to allow reduction in teaching staff or other resources (accommodation, student support services, library facilities, etc). There will also be additional costs in terms of staff time for liaison and planning with the partner institution. For the college, there are additional costs in terms of set-up (for example staff development, liaison, planning) and ongoing costs (tuition, administration and support for learners).
- 180 There will also be costs associated with travel both in terms of the provision and supervision of transport, and in terms of the time taken in transfer.
- 181 To move forward from the pathfinders to full implementation, analysis will also be needed of the following:
- recurrent and set-up costs
 - the costs of scaling up to national delivery
 - the sustainability of pathfinder activity beyond seedcorn funding.
- 182 Clarity and realism about the nature of management and cost implications should therefore be a key focus for pathfinders and be taken into account in reviewing the specification of the entitlement that should be available. In our view, it would be preferable for the entitlement to be universal, but realistic, rather than aspirational and unevenly available.

Question 47

Do you have a view on the way students attending both schools and college should be funded (paragraphs 8.12–8.13)?

- 183 The question of how students attending both school and college should be funded is one of the most difficult, but must be resolved if effective collaboration is to be achieved. As indicated in our response to the previous question, there are likely to be significant additional costs associated with collaborative arrangements of this kind. Exporting a number of students to an FE college for part of a week will yield only minimal cost reduction for a school due to fixed costs, but it will create additional expenditure for the college in making appropriate provision.
- 184 It needs to be recognised therefore that collaborative provision and individualised programmes are simply more expensive than the 'batch production' model employed for much of education. Splitting existing levels of funding between institutions is unlikely to be adequate. We recommend therefore that pathfinders explore the costs as a priority to identify these more precisely. In addition, the pathfinders should test out the feasibility of giving LSCs specific funding to support these additional costs.

Question 48

Do you support the ways we wish to encourage collaboration (paragraphs 8.15–8.16)?

Yes with reservations

- 185 We do not agree with the view expressed in the Green Paper that 'there is no disincentive to collaboration in the performance tables' (paragraph 8.14). Performance tables that encourage providers to maximise individual performance inevitably affect behaviours and will play a part in how players approach 14–19 partnerships. However, we welcome the intention to extend the range of achievement recorded in performance tables, and the longer term intention to develop value-added data. (See our response to question 39 in Chapter 7 for further details.)

- 186 We note the significant proposal that '*the parent institution is responsible for ensuring that its students receive high-quality education or training wherever it takes place*' (paragraph 8.14). This suggests that the relationship between the parent and delivery institution will be along the lines of a franchise arrangement. We suggest that this will put added strain on the collaborative partnership relationship between organisations. Moreover, parent institutions will not have the necessary powers to take on this role. We therefore suggest that it would be more appropriate to rely upon the quality and provider review systems of Local LSCs and the inspectorate to ensure the quality of provision.
- 187 In addition, we suggest that there is a disincentive to collaboration inherent in the funding methodology for schools and colleges that needs to be addressed. When 'funding follows the learner' there is a powerful financial disincentive for institutions to collaborate. This already leads, in some areas, to inappropriate recruitment practices by institutions and to the withholding of information about options at other centres. If schools see collaboration as a means of losing funding there will inevitably be resistance, even though it may not be articulated in these terms. This factor is of course compounded by the degree of financial pressure under which institutions now operate.
- 188 There are alternatives to funding systems driven by learner numbers that need to be explored as part of this initiative. One method, used in the past by LEAs for sixth form funding in particular, was to fund a curriculum offer without precise reference to the numbers recruited. This type of 'entitlement' funding might suit the 14–16 phase.

Question 49

Are there additional ways in which collaboration could be encouraged?

- 189 In addition to the links that individual providers will develop with their partners as they build new learning pathways for 14–19 year olds, more general encouragement should be given to creating strong foundations for continued collaboration across the board, in the best interests of learners and communities. Learning Partnerships have exercised this role with financial support from government. It will be important to build on the networks already created by successful Learning Partnerships and to enable their work to continue.
- 190 Responsibilities in relation to 14–19 provision reside with a number of agencies, LEAs, LSCs and Ofsted. Coordination between these agencies will be essential to minimise any confusion at the boundaries of these different roles. It is also important to be clear about which organisation should have a strategic overview of how well the local 14–19 pathways and the underpinning collaboration are working.
- 191 Removing disincentives to collaboration will be helpful ; however, it may also be necessary to create positive incentives to collaborate, both for learning providers and for employers.
- 192 The Green Paper refers to professional development for teachers to enable them to deliver qualifications to a wider age range. The proposed collaborative arrangements raise additional implications for staff development.
- Staff in schools and colleges may need help to develop the skills needed to work productively with other organisations, particularly where close links have not been established in the past. Skills in working as part of a multi-agency team may be required.
 - A range of skills is likely to be needed, including, for example, skills in working with other organisations to develop curriculum options and learner support.
 - Engaging employers effectively in work-related learning calls for particular skills and aptitudes on the part of learning providers.¹⁰ Staff development as well as time and appropriate materials will be needed.
 - There may be a need for significant awareness-raising about the range of other local organisations that could help broaden the learning and support options for 14–19 year olds. Our research, *Back on track*,¹¹ included a recommendation that cross-sector staff development workshops should be organised to promote a better understanding of the roles, responsibilities and cultures of different professionals to develop skills in joint working. In addition it recommended that a multi-agency approach to designing flexible options for Key stage 4 should be considered, drawing on the specialist skills of a range of professionals.



References

- 1 See Davies P. *Learning and earning: the impact of paid employment on young people in full-time education*. FEDA, 1999. This research highlighted the fact that young people now work significant hours alongside their post-16 studies.
- 2 *Connexions: a fair deal for all young learners?* Unpublished research. LSDA, 2001 (RPM404).
- 3 *Modern Apprenticeships: the way to work*. The report of the Modern Apprenticeship Advisory Committee, chaired by Sir John Cassels. DfES, 2001.
- 4 *Education for citizenship and the teaching of democracy in schools: final report of the Advisory Group in Citizenship*. QCA, 1998 and *Citizenship for 16–19 year olds In education and training: report of the Advisory Group to the Secretary of State for Education and Employment*. Further Education Funding Council, 2000.
- 5 *Connexions: a fair deal for all young learners?* op. cit.
- 6 The Raising Quality and Achievement Programme is run by LSDA in partnership with the Association of Colleges, funded through the LSC Standards Fund.
- 7 Davies P and Rudden T. *Differential achievement: what does the Individual Student Record (ISR) profile tell us?* LSDA, 2000.
- 8 *Listening to staff*, LSDA, 2001.
- 9 Davies H. *A review of enterprise and the economy in education*. HMSO, February 2002.
- 10 See Taylor S. *Getting employers involved: Improving work-based learning through employer links. Report and good practice guidelines*. LSDA, 2001.
- 11 Taylor S. *Back on track: successful learning provision for disaffected young people. Summary report and recommendations*. LSDA, 2000.

This paper sets out the Learning and Skills Development Agency's response to the Green Paper consultation *14-19 extending opportunities, raising standards*. The original consultation document can be found on the internet at : [www.dfes.gov.uk / 14-19greenpaper /](http://www.dfes.gov.uk/14-19greenpaper/)