
Response to the Department for Education's 16-19 Vocational Qualifications Review – 10 May 2013

<http://www.education.gov.uk/childrenandyoungpeople/youngpeople/qandlearning/otherqualifications/a00222542/vocational-qualifications-16-19-year-olds>

Q1) Do the three categories of qualifications reflect the diversity of qualifications and study aims for the 16-19 cohort?

Yes, these categories reflect the diversity of qualifications and study aims of the 16-19 cohorts. We must ensure, however, that within these categories we are adequately able to reflect the size and purpose of qualifications and programmes without unnecessarily confusing the end user, e.g. employers, learners etc and adding to an unnecessarily complicated qualification framework(s) structure. We would also question how these categories apply within qualification frameworks where these operate across Nations. For example Wales are also exploring their own categorisation of qualifications using a similar yet different system. This can only serve to further confuse particularly large employers who operate across the 4 Nations.

Q2) Are there examples of qualifications which cannot be effectively categorised in this way?

These categories should capture the majority of current vocational qualifications accredited into the NQF and the QCF for the age ranges of 16-19 year olds. There may be, however, qualifications that fit across categories, particularly where you have combined knowledge and competence qualifications (which may also fit into Apprenticeship programmes) and where units within these qualifications are intended to be generic 'employability' units/qualifications. We are also aware that in England we currently have two qualification frameworks in operation the QCF and NQF, and whilst this categorisation applies to the majority of qualifications, it could become extremely complex and confusing for employers who are trying to understand the categorisation of qualifications and across qualification frameworks. Particularly with the QCF, this categorisation goes against much of the ethos of the QCF which was to come away from 'qualification types', and brands.

Q3) How would these reforms impact on current apprenticeship frameworks?

The main impact will be on the effective categorisation of qualifications, and how we deal with qualifications that might not fit neatly into one category or another. The other danger is if Awarding Organisations put forward Apprenticeship component qualifications to Ofqual/DfE, which are rejected and not added to the list. This might mean that there is a gap in provision.

Page | 1

Q4) Do you agree the new categories of qualification should be called 'Academic', 'Occupational' and 'Applied General'?

On the whole, these category titles seem fit-for-purpose. We would have questions over whether the title 'Academic' will not get over the issue of academic qualifications been seen as superior to 'vocational' and so we do feel that an alternative that moves away from the historic connotations of academic would be more appropriate. What we must ensure is that we make the titles easy and transparent for those working outside of the education system to understand, for example employers. And, as such, we agree with the Occupational title, but would question the use of wording such as 'applied' - is this easily understood? We have to take care over the use of 'occupational' as well, particularly with the use of 'competence' to ensure that there is alignment and not confusion.

Q5) Do awarding organisations need a two year grace period to redevelop current qualifications to meet the characteristics required for Applied General and Occupational qualifications?

Yes, we feel that there will be the need for a period of grace, particularly around transition and communication to users (e.g. learners, providers, employers etc) is appropriate. However, we are implying that there will be the need to redevelop current qualifications to meet the characteristics. This may not be the case. We would also endorse that a collaborative, sector-based approach should be adopted to avoid proliferation of qualifications and qualification titles, particularly where this would again lead to confusion. This approach, particularly around the occupational qualifications should be led by impartial sector bodies to ensure that the needs of employers and the basis of National Occupational Standards are adhered to.

Q6) Do you agree with these standards for Applied General Qualifications?

Yes, the standards appear to hit the main objectives. What we must ensure, however, is that where the 'substantial qualification' is sector focussed, that this is delivering the skills, knowledge etc that are influenced by the needs of employers within the sectors. Currently there are many qualifications out there which meet these criteria, and some well known brands for example the OCR National qualifications, but we must ensure that these continue to meet the employers' needs and continue to deliver the employability skills that will benefit and aid in the progression of the learners.

Q7) What is the minimum proportion of the content of an Applied General Qualification that should be subject to external assessment?

The IMI would propose that advice is sought from awarding organisations on this point, as this could have a major impact on pricing and the systems and processes that go into external assessment. What we would say, however, is that there could be a relatively small amount of external assessment, provided the Awarding Organisations adopted a coherent approach of moderation on particularly the skills, concepts, theories and knowledge elements.

Q8) How can we best judge whether a qualification is valued by Higher Education Institutions?

With much work going on with the UCAS tariff rating process, there is surely a chance to tie in with the review to ensure that these proposed three categories can have an appropriate tariff-rating that is recognised by HE, and will therefore raise the status. Of course, the other key is having the opportunity to get feedback from representatives of HE on the content of the qualifications. We must not forget however, that employers as well as HE institutions are key to the value of qualifications, and HE as well as FE should be responding, to a certain extent, to the needs of the employers. The review and categorisation should not be done in isolation without key engagement with HE institutions, without it there will still be the same issues with the perception that vocational learning is the lesser route compared to academic, which is certainly not in any way the case and not what we are trying to achieve with this nor any of the other reviews that are currently being undertaken.



Q9) Do you agree with these standards for Occupational Qualifications? Can they be applied across any sector or local area?

Yes, the definition seems to be appropriate. The IMI are pleased that there is a real importance put on the employers having a lead on the design and content of the Occupational Qualifications - and this is building on the best practice as to where this has really worked previously, and where qualifications have met the needs of sector and industry. We need to be mindful around the use of occupational with 'competence' qualifications, e.g. NVQs, as again this could cause confusion. We also need to ensure that there are common Assessment Strategies used for occupational qualifications, which should be set and monitored by impartial organisations. These Assessment Strategies should emphasise the use of the employers playing a major part in the assessment of the learners to measure the learner against the occupational requirements. Again, there are examples where this has worked extremely well where Sector Skills Councils have worked collaboratively with awarding organisations. Whilst the occupational qualifications should be designed to meet the needs of employers we must not forget that they will need to be some form of facilitation role carried out by a body who remains impartial, and we believe that this has been effectively achieved historically by some Standard Setting Bodies, who have acted effectively as a conduit between employers and awarding organisations, and linking the qualifications to the National Occupational Standards. We believe that there is much merit in this role remaining with bodies that are impartial.

The grading of occupational qualification is an interesting conversation, and one that has often cropped up. Many would say that you would either competent or not, however many other would say that competent does not necessarily mean mastery, so this is where a grading within the occupational qualifications could make a real difference.

We must be mindful that those qualifications which will fit into this category may be part of existing Apprenticeship frameworks, and may form the Apprenticeship qualifications (as per the Doug Richards review) moving forward and so we must ensure that the criteria for these qualifications meet also those recommendations coming out of the Doug Richard review. We also firmly believe that the basis for any effective Occupational qualification will be the National Occupational Standards - the industry set standards designed and developed by employers for employers.

As well as the Assessment Strategy, NVQ qualifications have been based on the Code of Practice developed by Ofqual (formally QCA), we would suggest that many sectors have moved away from the Code of Practice because of its rigidity. Whilst this makes an interesting case, there is still some learning that can be used in terms of the design criteria for the Occupational Qualifications - particularly the minimum duration (12 week rule), and we should not lose these past lessons.

Q10) How can awarding organisations support providers in engaging local employers in delivering and assessing qualifications on the ground?

This would be a question best answered by awarding organisations. One thing the IMI (SSC) would be concerned about, however, is the amount of proliferation that could occur with developing of qualifications for individual customers, rather than developing a set of qualifications to meet sector needs (the sector needs may not differ between local employers). With proliferation comes potential confusion, and much work has been done over the last few years, particularly around occupational/competency qualifications to ensure coherent provision that is easily understood by employers and learners.

Q11) How should we evidence provider engagement with local employers in the delivery and assessment of Occupational Qualifications?

Please see the response to Q10.



Q12) Should the Skills Funding Agency approve the funding of Occupational Qualifications (irrespective of whether they are on the QCF) if a learner is over the age of 10 and under 25 and entitled to funding under the terms of Adult Entitlement of Learning?

The simple answer to this question is yes. Of course, added to this there should be the qualifiers as per previous funding guidance that it should be the learner's first Level 3 qualifications. Of course we are then presented with the issue and confusion of having two different qualification frameworks, which could cause issues of misunderstanding moving forward and could have an impact in the qualifications which could have a very different make-up (QCF quals being made up of Notional Learning Hours which make the credit) and the NQF qualifications being a type and based around qualification (not necessarily unit) sizes. These are the complexities that the funding agencies would need to work through to ensure that qualifications in either frameworks are funded at the same rates.

Q13) Should the Skills Funding Agency consider funding certain Applied General Qualifications in the same way? If so, what criteria should be used to identify these?

Yes, the SFA should consider funding the Applied General Qualification in the same way. Again, we believe that there has to be firm rules to ensure that, for example, it is the learners first Level 3 qualification etc, and as with Q12 above, we believe that there has to be comparability in the funding rates with qualifications across the NQF and QCF and that the rates for the Applied General Qualifications reflect the full-time class room nature of the qualifications - i.e. direct contact.

Any other comments?

The IMI are mindful of the number of consultations being carried out, which are all interdependent and which could have a severe impact on the stability of the vocational qualification system. We are mindful that the vocational qualification landscape is already seen as confusing and bureaucratic for employers and learners, and we must strive for simplicity and stability, otherwise employers will disengage. This aside, the aims of creating equality between the vocational and academic routes is an admirable one, and one which the IMI and the sector whole-heartedly support. We must ensure, however, that all of the consultations are aiming at the same objectives and goals and each complement one another, without this, we could see irreparable damage to the vocational qualification system, and particularly stakeholder confidence in it.

