

Response to the Green Paper

14-19: extending opportunities, raising standards

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About the Learning and Skills Council

The Learning and Skills Council is responsible for all publicly-funded post -16 education and training in England, other than higher education.

For the year 2002-03, the Council has a budget of £7.3 billion, to support:

- further education
- school sixth forms
- work-based learning for young people
- workforce development
- adult and community learning.

The Council is a national organisation, with 47 local Councils based throughout England. The local Councils plan and fund services to meet local needs.

The mission of the Learning and Skills Council is:

To raise participation and attainment through high-quality education and training which puts learners first

The vision of the Learning and Skills Council is:

By 2010, young people and adults in England will have knowledge and productive skills matching the best in the world

Introduction

1 The Learning and Skills Council welcomes the Green Paper as further evidence of the Government's commitment to improving the quality and standards of education and training in England. The proposals in the Green Paper stand to contribute significantly to the achievement of the Council's mission and vision for the education and training of young people, as set out in our Corporate Plan:

"Our mission is to raise participation and attainment through high-quality education and training which puts learners first."

"Our vision is that, by 2010, young people and adults in England will have knowledge and productive skills matching the best in the world."

2 In particular, the Council wishes to establish a culture in which there is maximum local freedom and flexibility, within a nationally-determined set of standards for quality and outcomes, and we are committed to the removal of barriers which deter young people from learning or inhibit innovation. We recognise, in particular, the challenge we will face in overcoming the practical difficulties associated with the provision of broad-based education and training opportunities in rural areas.

3 The case studies included in the Green Paper, and the many other examples of effective local initiatives and collaboration of

which we are aware, show what can be achieved. As part of our response, we encourage and add value to local activity, and disseminate good practice.

4 In developing this response, the two key principles which we have borne in mind have been, first, whether the proposals will assist the Council in achieving the aims and objectives set out in its Corporate Plan, and secondly, whether the proposals are in the best interests of learners.

5 The members of the local and national Councils are drawn from a wide range of interests, including employers, schools, further education, work-based learning and local authorities. The discussion, therefore, and meetings of those Councils will have covered the wide range of issues raised in the Green Paper. However, it is clear that, in its formal response to the Green Paper, the Council should give the main focus of its comments to those issues which fall clearly within its remit.

General

6 From the age of 16, participation in education and training is voluntary. Participation rates, therefore, are affected by a number of factors, not least of which is the economic performance of the country and the availability of low-skilled, but well-rewarded, employment. There are still many parts of the country where young people do not feel that there is a strong expectation that they will continue in learning from 16.

7 Attainment rates at age 19 have risen in line with increased attainment by young people at age 16. A number of factors will have contributed to that rise, including an increased focus on quality of teaching and learning.

8 In the last two or three years, both participation rates and attainment rates have reached a plateau, and it is clear that a new drive is essential if we are to move forward other than marginally.

9 Whilst the headline rates for participation and attainment are those of level 2 and level 3, the Council is committed to providing maximum access for **all** young people to high-quality education and training opportunities.

10 The Council's approach to inclusive learning is that learning should be tailored to the needs of the individual learner, rather than that the learner should have to adapt to the delivery method. It is encouraging to see that this

approach underpins much of the Green Paper.

11 The Council therefore welcomes the Green Paper, and the increased flexibility to try innovative approaches, whilst maintaining a commitment to high, and improving, standards.

12 This response carries the weight of the experience and input of the 47 local Learning and Skills Councils as well as the National Council. Local Councils were invited to send comments on the consultation to the National Council. The comments of local Councils, and the responses from young people at focus groups commissioned by the Council, were considered by the Council's Young People's Learning Committee, and informed that Committee's advice to the National Council.

13 The Council's response to the specific questions raised in the Green Paper is attached in part B. The Council wishes, however, to highlight its views on six particular issues.

1: 14-19 curriculum and the overarching award

Proposed 14-19 curriculum

1.1 The Council very much welcomes the proposed curriculum as described in the Green Paper to underpin the 14-19 phase of education.

1.2 The Council believes that the proposals will form the basis of a curriculum that stands to improve the motivation of young people as well as raising their aspirations - aims which the Council strongly shares.

1.3 We support the view that the three broad strands of key skills, core qualifications and wider activities should be the basis of the curriculum entitlement for all young people aged 14-19. The Council looks forward to being involved in developing the details of this curriculum entitlement. We believe that, in particular, the employer perspective should continue to be brought to bear on future curricular developments.

1.4 We would also suggest that published inspection reports should comment on the extent to which institutions, either on their own or in partnership with others, are making this entitlement available to their learners.

The overarching award

1.5 The Council is aware that the proposals for an overarching award have not gained unanimous support. Whilst the objectives are recognised, some partners have misgivings over some aspects of

this award – even to the extent as to whether it is a necessary element to the 14-19 proposals as a whole.

1.6 We believe that the proposals for an overarching award need further careful consideration and policy development.

1.7 We also believe that any further debate and work on the overarching award should not distract attention or divert energy and resources from implementing the rest of the proposed 14-19 curriculum and proposals in the Green Paper. In our view, it would be more important to implement the main proposals for the 14-19 curriculum.

1.8 The Council supports an overarching award providing that it is clear that the award had credibility and currency with both employers and with higher education, and that there were clear indications that the award would be a motivating - not a distracting - factor for young people.

1.9 In developing the arrangements, the Council believes that further thought needs to be given particularly to the levels of the award. The Council is clear that an overarching award must be inclusive, with all young people achieving at least a Foundation (or equivalent) level. In that way, **all** young people can receive proper recognition for their achievements at whatever level.

1.10 The Council is not convinced of the need for a differentiated award at level 3, and would recommend that further thought be given to having an award available at Foundation, Intermediate and Advanced levels. The Foundation award would be available to all, with the Intermediate and Advanced awards equating to level 2 and level 3 respectively.

1.11 The Council believes that the award must be available after the age of 19, particularly for those

pursuing Modern Apprenticeships, but also for some following other programmes.

1.12 Whatever direction the policy on the overarching award takes, there will still be a need for a robust system linking the individual learning plan to achievement. Different models might be investigated through the proposed pathfinders.

2: 14-19 qualifications and assessment

Qualifications

2.1 Having described the nature of the curriculum to which young people should be entitled, it is critical that the qualifications available fully support that curriculum.

2.2 We welcome the proposed changes to qualifications - and to performance indicators - as a key component of the strategy to drive up achievement at level 2 and level 3.

2.3 We especially welcome the proposed removal of the unhelpful 'vocational' label from qualifications. In our view, this label had become one of the barriers to achieving parity of esteem between different pathways.

2.4 We would wish to emphasise the continuing and developing role for a wide range of qualifications in addition to GCSE and AS/A2 levels, and the role of all providers - work-based learning providers and employers, further education institutions and schools - in delivering those qualifications for young people.

2.5 The introduction of an increased vocational focus in GCSE and A level subjects must also be reflected in a broader range of training and learning styles.

Assessment

2.6 The Council has a practical concern about the capacity of the external assessment system to cope with new demands on it.

2.7 The proper assessment of young people will be a critical factor in the success of the 14-19 proposals - particularly in relation to qualifications and programmes with a vocational focus.

2.8 We consider that the Green Paper proposals offer a chance to reaffirm the value that the qualifications and assessment regime can have in motivating young people, leading to greater retention and higher achievement.

2.9 The Council strongly believes that an assessment system should be designed from the outset to cater for all young people - not just those of higher ability.

2.10 We have some concerns about the impact of the assessment system for AVCEs. We believe that a reappraisal should be undertaken of what has worked in the past in terms of assessment regimes that have demonstrated success in improving retention and progression, rather than simply replicating the AVCE approach.

Performance indicators

2.11 The Council welcomes the proposals to extend the qualifications included in school performance tables, and appreciates the need to avoid any further unnecessary changes, but believes that a review of entry and

foundation level qualifications should be undertaken. Those qualifications are an important stepping-stone towards level 2, and should provide a full range of courses, with appropriate assessment techniques.

2.12 The Council strongly supports the proposal that performance indicators for schools and colleges should reflect achievement by 18-year-olds of level 2 and level 3, and the value added by institutions.

2.13 The Council believes that the performance of young people at age 16 will continue to be an important indicator of progress

towards achievement at age 18, both at institutional level and aggregated by localities. However, the establishment of a 14 – 19 phase implies greater focus on achievement at the beginning and end of that phase.

2.14 Whilst the Council does not subscribe to the view that a reduced emphasis on achievement at 16 would in any way reduce the status of the GCSE examinations, we consider that the requirements of school performance tables do need to be re-assessed to ensure that they do not inhibit the development of the 14-19 phase as envisaged by the Green Paper proposals.

3: Collaboration

3.1 In 1997, Ministers asked the Further Education Funding Council (FEFC), the TEC National Council and the Local Government Association to bring forward proposals for local collaboration in order to raise standards, increase accountability and improve cost-effectiveness in post-16 education and training. Resulting from that joint working, two studies of local collaboration were published, one commissioned by the FEFC, and one a joint study by FEFC and OFSTED.

3.2 The findings of those two studies remain valid, and are worth revisiting.

3.3 The overall conclusion is that collaborative partnerships can lead to significant benefits to students, teachers and institutions, but that those benefits are achieved only where there is commitment by all parties to the partnership, and a willingness to compromise. Both studies also acknowledge resource issues, to which we refer in more detail later.

3.4 Whilst there are examples of good practice of schools working collaboratively, many will not have that experience, and may in particular need to adapt to a new culture of collaboration.

3.5 The Council considers that it is important to make clear to schools, colleges, private training providers and employers that we believe collaborative working is in the best interests of all partners, and in particular to young people, by providing them with greater

opportunity to access provision of the highest and excellent quality.

3.6 We appreciate fully that collaboration is not always easy. We believe that it is essential that the Council, nationally and locally, develops close working relationships with a wide range of bodies representing our four main funding streams: schools, colleges, work-based learning providers and adult and community learning in order to demonstrate our own commitment to collaborative working, and also in order to offer support where necessary to local partnerships. While it is important that we engage fully with the wide range of providers, it is essential that we engage also with those who provide the progression routes for young people into higher education and employment.

3.7 The main strengths and advantages of collaboration have been identified as being:

- a significantly broader curriculum offer
- a wider range of routes for progression
- protection for “minority” subjects
- increased cost-effectiveness
- stability in planning
- more balanced information about courses and progression
- increased opportunities for staff.

3.8 Barriers that have been identified include:

- a lack of clear joint strategic planning
- inadequate quality assurance at partnership level
- insufficient analysis at partnership level
- communication between partners
- loss of autonomy
- demands on staff time
- cost and inconvenience of travel between sites.

3.9 Finally, a number of key factors encouraging collaboration were identified. These include:

- strong commitment from senior management
- the appointment of an independent coordinator at a senior level
- transparent and equitable funding
- regular and efficient contact between partners
- common timetabling and systems
- joint marketing.

3.10 There are already many examples of collaboration between work-based learning providers, colleges and schools.

3.11 It would be wrong to suggest that collaboration is always easy, or always successful. Collaboration depends on commitment and a willingness to compromise. Nevertheless, there can be many benefits from collaboration, including for school sixth forms. Being part of a successful partnership, which provides a

broad range of opportunities for all young people can ensure the place of a school sixth form - of whatever size - within the local pattern of provision. By developing a specific expertise within the partnership, a small school sixth form may have greater security about likely student numbers in the medium term, and protection from damaging year-on-year fluctuation in numbers. Smaller institutions in a partnership may have access to a far wider range of resources, both physical and human; they can share materials and staff with their partners, including the exciting possibilities of "virtual sharing" now offered by new technology.

3.12 Ministers have indicated that they wish to see "education with character". We believe it is crucial to the success of a collaborative partnership that not only does the partnership itself have a clear and strong identity, but that the individual partners retain their unique identities. One of the great strengths of a partnership can be that individual young people are able to find a "home" institution which suits their individual temperament.

3.13 As we develop our funding and planning remits, we will fully consider the effect of collaborative arrangements. We will look at the implications of collaboration in local areas, particularly rural areas where the costs may be expected to be higher.

3.14 Institutions may need to have some specific support of one kind or another to meet the demands of collaboration.

3.15 We look forward to developing our existing relationships with DfES, LEAs, schools, colleges and others, and forming effective partnerships both nationally and locally in order to deliver the 14-19 agenda.

3.16 We expect that local Councils will play their part by taking the lead where appropriate in facilitating collaboration. The Council will make available funding matching that being provided by the DfES for the pathfinder projects.

4: Support and guidance for young people

4.1 Financial incentives clearly have a part to play in increasing participation by young people. The Council's funding methodology includes an uplift based on relative deprivation (using postcode as a proxy), which is intended both to recognise the increased costs associated with recruiting and retaining the "hard to reach" (and also to reward those institutions which are successful in recruiting additional numbers of students from specific localities). The impact and effectiveness of that approach is being reviewed currently. The Education Maintenance Allowance pilots, which provide cash direct to young people, help to make education and training a realistic economic alternative to employment, whilst also reinforcing attendance and retention. All available evidence suggests that the EMA pilot areas have seen increased participation. There are questions to be addressed about coverage, level of payment and the means by which payment should be made. Nevertheless, we believe that the pilots have demonstrated the case for direct student support.

4.2 The terminology covering "advice and guidance" is not consistent among all partners. The Council uses the term careers education and guidance (CEG) for young people up to the age of 19, and information, advice and guidance (IAG) from age 19. We suggest this terminology could become the norm.

4.3 By acknowledging that the impartiality and quality of advice

and guidance available to young people, and in particular at age 13/14 is the key to the success of the Green Paper proposals, the Government has created the opportunity to establish CEG firmly at the heart of the 14-19 curriculum. We welcome the proposal for the development of a framework for CEG in schools. We are mindful, and support, the Government's desire to reduce to the minimum the compulsory elements of the school curriculum, but believe that there is a case for CEG to be subject to a statutory framework.

4.4 The quality and status of CEG in schools varies greatly. In some areas of the country, high-status and high-quality CEG is recognised through a Quality Award, in other areas, CEG is seen as a bolt-on to the curriculum, rather than a core element.

4.5 We do have some concerns over the ability of all schools to give good quality and comprehensive guidance to all their pupils on the options that available.

4.6 There may be a case for ministerial encouragement, rather requirement, for schools, colleges and other providers to seek such recognition. Evidence that CEG was free of any institutional bias should be a requirement of any such award. Alongside a new framework for CEG will be a need for significant in-service training.

4.7 The Connexions Service pilots have demonstrated the potential of the service. It is

particularly helpful that the boundaries of the Connexions Service are co-terminous with those of the local Councils. There is already much good joint working being undertaken at local level. Some concern has been raised about the increased use of the term “differentiated” when the coverage of the Connexions Service is being described. We accept that some young people need more advice and guidance than do others, but are concerned that this should not be at the expense of others. There may be a case for identifying a minimum entitlement for all young people for time spent with a personal adviser. We would urge ministers to ensure that sufficient funding is provided to enable the Connexions Service to be fully operational at the earliest opportunity, and has the capacity to meet the demands which will be placed on it.

4.8 It is right that the focus on advice and guidance for young people should be on CEG in schools and on the Connexions Service. The Green Paper acknowledges the importance of including parents/guardians when individual learning plans are being drawn up. There are, however, a number of other agencies which do, or could, influence decisions being made by young people. It is important to ensure that linkages to these other agencies are understood and effective.

4.9 In particular, it is important to ensure that high quality support and guidance is available not only for those on full-time routes, but also for the significant numbers of young people – up to 35% of 16-19 year olds – who wish to combine

employment with their continuing education and training.

4.10 The Council is committed to ensuring that in meeting its targets it moves towards equality and social inclusion rather than consolidating inequality and social exclusion. In March 2002, the Council published guidance on Equality and Diversity Impact Measures to assist local Councils to set measures to address inequality across a range of characteristics, including sex, race and disability. Alongside the introduction of a wider range of learning options, therefore, we would argue that there must be strategies to challenge traditional stereotypes of curriculum choice.

4.11 It is also important to ensure continuity of advice for young people both on entering and leading the 14-19 phase. The Council believes that lead responsibility for CEG should lie with the school to the age of 14, with Connexions to age 19, and thereafter with IAG partnerships. It is essential that each of those bodies understands and accepts its lead responsibility, and also accepts the responsibility to work with other partners to ensure smooth transition of support and guidance between the different phases.

5: Resources

5.1 It will of course be critical to ensure that there are proper resources to implement the proposals effectively. The resource issues are two-fold: a sufficient supply of appropriately trained staff to deliver the learning; and financial resources to underpin the expected increased costs particularly of collaboration.

5.2 We recognise that there are concerns currently about the supply of lecturers, teachers and training providers, in certain occupational or subject areas.

5.3 We also believe the proposals can help to raise the status of training in the workplace. We would also hope that they will provide an opportunity for wider experience of training providers, lecturers and teachers.

5.4 However, recruiting and retraining the staff required to deliver the Green Paper proposals, with the special skills those staff will require, will involve further initiatives. One significant barrier is the wide and growing difference in the pay, qualifications and conditions of service for staff in the three routes. This must be addressed urgently.

5.5 To give an indication of the costs involved in bringing the level of funding for the different sectors into line, we repeat the advice we gave to the House of Commons Education and Skills Committee in November 2001. To bring the level of funding for full-time 16-18 year-olds in further education up to that available for schools would involve

additional funding in the order of £280 million annually. To bring the funding of work-based learning for 16-18 year-olds up to that of school sixth forms, an initial estimate would be around £75 million annually.

5.6 Secondly, there will be costs associated with the introduction of wider choice from age 14, and costs associated with collaboration. We estimate that it might cost in the order of £100 million annually to enable 200,000 young people aged 14-16 to pursue vocational options. Those costs will arise from: smaller class sizes for vocational subjects 14-16; costs of supporting collaboration; and in-service training for staff in schools, colleges and work-based learning. There would be associated capital costs, which we estimate might be between £100 million and £150 million over a 5-year period.

5.7 We expect that there are likely to be some cost implications on institutions that may need to be reflected in the institution's funding arrangements.

5.8 There are early indications, and we would of course need to do some further work on the costs in order to advise more fully. We expect that there would also be some savings that can be achieved through the more effective use of resources, both human and physical. There are also long-term benefits to the economy, both through improving employability and productivity and by reducing the current waste of talent.

6: Implementation and next steps

Implementation proposals

6.1 The Council is pleased to see that the Government has responded to recent complaints about “initiative overload”, and has put forward a measured, incremental and extended timescale for the full implementation of the Green Paper proposals. Ironically, we expect some pressure from institutions that wish to push forward more rapidly.

Next steps

6.2 Much of the Council’s work already supports the principles underpinning the 14-19 Green Paper. We shall look to see how we can further develop our support.

6.3 In particular, we are running the Increased Flexibility initiative referred to in the Green Paper, which encourages both collaboration between schools and FE institutions, and quality vocational learning. We shall monitor those programmes to see what lessons can be learnt and what good practice can be spread.

6.4 We welcome the proposed 14-19 pathfinders. We expect local Councils not only to support other partners in taking these proposals forward, but also to be

ready to take a leadership role where appropriate.

6.5 The Council has made a commitment to match DfES funding in order to extend the range and scope of pilots from September 2002, and will manage the pathfinders jointly with the DfES.

6.6 At local level, we will work closely with LEAs to develop simple but effective arrangements to enable us to monitor and evaluate the impact of the proposals and of local innovative projects. We will also want to establish mechanisms by which good practice in one area of the country can be readily available to others.

6.7 We also believe that it is essential that the interrelation of the many different initiatives being pursued currently, and proposed in the Green Paper, should be mapped and fully understood. There is a clear need to develop “exit strategies” for those initiatives, and to make institutions fully aware which initiatives are expected to become part of mainstream activity, and whether the core funding for institutions will be increased in order to enable that increased activity.

Part B

Chapter 1: The Vision For The 14-19 Phase

Q1 Do you share our vision of the 14-19 phase?

Yes: the vision fully complements the Learning and Skills Council's own mission. We believe that implementing the broad thrust of the Green Paper will contribute to our meeting our targets over retention and achievement by young people over the age of 16.

Chapter 2: 14-19: Marking the Start of the Phase

Q2 Do you agree that the aims set out in paragraph 2.6 are the right ones to mark the start of the phase?

Yes: we expect others – including local Councils as appropriate - to work in partnership with schools to support them in meeting these aims.

Q3 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: however, the Council believes that all pupils should have an individual learning plan, and would suggest that for pupils with special educational needs, the transition plan should stand alongside the individual learning plan, rather than in its place.

Q4 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?

The Council would be willing to work with others over the development of appropriate arrangements should that be appropriate and helpful.

Q5 Would you welcome guidance on how different models of marking the start of the 14-19 phase might be developed (paragraph 2.7)?

Yes: we would be ready to work with partners on this issue; it may be possible to test different models through the pathfinder projects.

Q6 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)?

We expect that schools would find it helpful.

Q7 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?

The Council considers that it is important that young people are aware of the multiple routes that are available into higher education, and identify higher education in terms of the level of study, rather than the institution in which the study takes place. The Green Paper rightly makes the case for parity of esteem between general and vocational subjects at 16 and 19, but it is important to emphasise also the equal value of level 4 qualifications, whether achieved through study at university, further education college or through the workplace.

Chapter 3: The Content of the 14-19 Curriculum

Q8 Do you agree with the rationale for the 14-16 compulsory curriculum set out in paragraph 3.9?

Yes: though what is considered 'essential' will be open to debate.

Q9 Do you agree that mathematics, English, science and ICT should form the core of the 14-16 curriculum?

Yes: we support the inclusion of science in the core curriculum.

Q10 Do you agree that the areas set out in paragraphs 3.12-3.14 should also be compulsory at 14-16?

Yes: we welcome particularly the inclusion of work-related learning.

Q11 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: we would want to see that this statutory entitlement was rigorously monitored.

Q12 Do you support the changes to the disapplication arrangements proposed in paragraph 3.24?

Yes: it would appear to be a pragmatic step.

Q13 Do you support the extension of vocational options proposed in paragraphs 3.28-3.29?

Yes. The Council has worked jointly with the DfES on the £38 million Increased Flexibility initiative, promoting the introduction of GCSEs in vocational subjects and increased uptake of work-related learning by 14 – 16 year-olds. There has been a very positive response to this initiative from partnerships of schools, colleges and private training providers, including a number of innovative projects. Over 300 separate projects – at an average of £100,000 per project – have been approved.

Q14 Do you support the development of hybrid qualifications as proposed in paragraph 3.30?

Yes: these qualifications also have the potential to be attractive to young people.

Q15 Do you agree that in future all GCSEs should be called simply that (paragraph 3.31)?

Yes: we believe that the ‘vocational’ label is unhelpful.

Q16 Are there other ways in which you think GCSEs might evolve?

The Council believes that the proposals in the Green Paper should be given time to become embedded, and to be understood by young people, their parents and employers before any further significant changes are made to the qualifications framework.

Q17 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)?

We would incline to support the continuation of the AEA rather than introduce new changes at this stage.

Q18 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)?

As for Q17, we would incline towards supporting the continuation of the AEA.

Q19 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)?

Again, we would suggest that the AEA should for the time being remain the means for more able candidates to demonstrate their ability.

Q20 Do you agree with the proposal to relabel vocational A Levels in paragraph 3.41?

Yes: as with GCSEs, we believe that the 'vocational' label is unhelpful.

Q21 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)?

Yes: it is likely to be a critical element in meeting level 2 targets.

Q22 Do you support the framework proposed in paragraph 3.44?

Yes: we firmly support the principles.

Q23 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. It will be important to encourage employers to provide opportunities for marginalised learners and, in particular, for those young people with learning difficulties and/or disabilities.

Chapter 4: Recognising achievement - a new award

Q24 Do you agree that there should be a new overarching award to recognise achievement by age 19 (paragraph 4.2)?

Yes: if it is clear that the award would have currency with employers and with higher education; and would motivate young people.

Q25 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?

The Council would wish further consideration be given to this issue. A combination of the two options may be a suitable alternative. That would enable all young people to receive an award, but it would be differentiated by levels of achievement.

Q26 What do you think the award should be called (paragraph 4.3)?

We think it unnecessary to focus on the name of the award until further development work has been done. Whilst many people, including young people, have expressed reservations about the title 'matriculation diploma' it seems to serve as a working title for the moment.

Q27 Do you agree with a structure for the award that includes a common strand and main qualifications (paragraph 4.8)?

We believe it could be a sensible structure for such an award. It will be important for the award itself, not just the component parts, to have currency and recognition with employers and higher education.

Q28 Do you agree that there should be a record of progress for those who do not gain the Intermediate award (paragraph 4.9)?

The Council believes that if there is to be an award it should be fully inclusive, with a Foundation award for those who do not reach the Intermediate level.

Q29 Do you agree with our proposal that the Diploma should have three different levels (paragraph 4.10)?

We agree that there should be three different levels, but suggest below that those levels should be different from those proposed in the Green Paper.

Q30 Do you agree with our proposals for main qualifications thresholds for the Intermediate, Advanced and Higher Diplomas (paragraph 4.10 and diagram 1)?

The Council believes that an alternative approach for an inclusive award might be for the three levels to be Foundation (recognising achievement up to level 2), Intermediate (recognising achievement at level 2) and Advanced (recognising achievement at level 3).

Q31 Should General Studies A/AS Levels count towards the thresholds for the Advanced and Higher Diplomas (paragraph 4.11)?

It may well have some value in counting towards those thresholds.

Q32 Do you agree that the Diploma should have a common strand of attainment at Level 2 in literacy, numeracy and ICT (paragraph 4.12)?

In the context of the Council's advice on the levels of the overarching award, we suggest that further work is necessary on the content of the award at different levels.

Q33 Do you think wider activities should be required for the achievement of the Diploma (paragraph 4.13)?

Yes: we consider this would be an important aspect in developing the award.

Q34 How do you think the wider activities should be assessed (paragraph 4.14)?

The Council believes that ways should be identified in which the wider activities can be recognised, rather than necessarily being assessed or accredited.

Chapter 5: Pace and Progression

Q35 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.

Chapter 6: Advice, guidance and support for young people

Q36 Do you support the proposed focus of the national specification for careers education and guidance described in paragraph 6.7?

Yes: this will be a critical issue.

Q37 Do you agree that it should begin from Year 7, with a very light touch in the early stages of Key Stage 3?

Yes: it would be important to begin at an early stage.

Q38 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)?

The list provided in paragraph 6.10 appears to be a comprehensive basis for the work of Personal Advisers. It may be helpful to include as an explicit role of Personal Advisers that they should feed back to other key partners, including LEAs and local Councils.

Chapter 7: Drivers and support for change

Q39 Do you support our proposals for extending the qualifications included in the performance tables (paragraphs 7.10-7.15)?

Yes: we believe this is a useful step but will need very careful development work.

Q40 Do you agree with our proposals for recording the performance of AS (paragraph 7.19)?

Yes: again, it would seem useful, but needs careful development work.

Q41 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)?

It is essential that institutions should not be penalised in performance tables for allowing young people to progress at the most appropriate rate.

This issue would be of no consequence if achievement at 16 was no longer presented in the format of performance tables.

Q42 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 (paragraphs 7.23)?

Yes.

Q43 What further measures would help to support improvement in the FE sector (paragraphs 7.33-7.38)?

Paragraphs 7.33-7.38 set out actions being taken by DfES and the Council currently across a broad range of fronts. We believe that these actions will support continued improvement.

Chapter 8: Implementation

Q44 Do you agree with the timetable indicated (Appendix 1)?

Yes: we welcome the measured implementation timetable.

Q45 Do you support our proposals for pathfinders (paragraphs 8.7-8.10)?

Yes: we will work jointly with the DfES over these pathfinders and will provide funding matching that being made available by the DfES to enable more projects to be taken forward.

Q46 Are there aspects other than those mentioned which should be covered by the pathfinders?

We will work with the DfES to ensure that all appropriate aspects are covered.

Q47 Do you have a view on the way students attending both school and college should be funded (paragraphs 8.12-8.13)?

We would wish to investigate this issue through the pathfinders. We would not necessarily expect a single approach to be appropriate in all circumstances.

Q48 Do you support the ways we wish to encourage collaboration (paragraphs 8.15-8.20)?

Yes.

Q49 Are there additional ways in which collaboration could be encouraged?

We would expect the pathfinders to identify additional ways in which collaboration can be encouraged.

Conclusions

Q50 Having considered the Green Paper as a whole:

(a) Do you think that we have identified the right issues to address in our proposals?

Yes: and we expect the pathfinders to identify the further issues.

(b) What, if any, other issues need to be tackled?

Issues of funding and funding flows, to increase coherence and simplicity of arrangements.

(c) On balance, do you support the proposals we are making to develop a coherent, flexible 14-19 phase?

Yes: and we look forward to supporting the implementation.