

Response

to the Working Group on 14-19 Reform:

PRINCIPLES FOR REFORM OF 14- 19 LEARNING PROGRAMMES AND QUALIFICATIONS

About the Learning and Skills Council

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

For the year 2003-04, the LSC has a budget of over £8 billion, to support:

- further education
- school sixth forms
- work-based learning for young people
- workforce development
- adult and community learning
- information, advice and guidance for adults
- education business links.

The LSC is a national organisation, with 47 local LSCs based throughout England. The local LSCs plan and fund provision 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

Introduction

The Learning and Skills Council (LSC) is committed to making a positive difference to the life chances of young people. We are determined that **all** young people should have the opportunity to achieve their full potential in learning and training.

The LSC welcomes the progress report from the Working Group on 14-19 Reform. It is clear that substantial progress has been made by the Group in the first few months of its work. We are pleased that the Group is involving a wide range of interested parties in its main Group and in its sub-groups. Ian Ferguson (a member of the LSC's Young People's Learning Committee) is a member of the Working Group, Chris Humphries (a member of the LSC's Adult Learning Committee) is a member of the coherent programmes sub-group and LSC staff are contributing directly as members of the coherent programmes and Young People's sub-groups.

The LSC strongly supports the vision described in the Government's policy document *14-19: opportunity and excellence*. To achieve that vision, the LSC 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, where learning is tailored to the needs of the individual learner, rather than requiring the learner to adapt to the delivery method. We are, therefore, pleased to see that the reform of the curriculum is being driven by the needs of the individual learner.

We are convinced that it is the design of curriculum, rather than lack of ability, which is one of the main barriers for the many of the young people who are not achieving their full potential currently. Change is necessary, whilst maintaining the rigour and standards which underpin current arrangements.

The structural changes which the Government has put in place – such as the establishment of the LSC, the Connexions Service and the development of Sector Skills Councils – have given a much clearer context for the activity and achievements of young people. The wider remit of Ofsted and the linkages which are being established between Area Wide Inspections and Strategic Area Reviews are helping to identify both the needs of a locality and appropriate ways of meeting those needs. It is important to recognise that in a number of local areas these curriculum reforms will take place at the same time as institutional reorganisation. In this context, it is helpful to see that the proposals in the progress report are consistent with the five key principles which Ministers have adopted to underpin the organisation of 16-19 provision.

We will have interests at a number of levels in the developing work. We believe that these reforms can help us to achieve our overall objectives, and our targets for young people for participation, achievement and increased skills levels.

This response has been informed by comments from our 47 local Learning and Skills Councils and from the LSC's Young People's Learning Committee and the LSC National Council.

The first part of this response provides a commentary on the progress report from the perspective of the LSC.

The second part of the response sets out a number of issues which the LSC considers it will be necessary to address in the next phase of the review, in order to ensure that the vision can become a reality.

Answers to the specific questions in the progress report are provided at the annex.

We will continue to play our full part in driving forward the 14-19 agenda. In doing so, we will also strenuously fulfil our responsibilities to ensure the quality and accessibility of provision both for those young people who are currently in the system and those 180,000 young people not in education, employment or training. It is essential that the standards, status and currency of qualifications available to young people are maintained throughout the transition to the new arrangements. Effort and resources must continue to be used to scrutinise and revise existing programmes, even if they are likely to be phased out or replaced.

Throughout this response, the term “learning provider” will be used to refer to private training providers, work-based learning providers and providers in the community and voluntary sectors.

PART 1 - COMMENTARY

The progress report is an important document. Some general points are worth highlighting.

First, the proposals are radical, and whilst it is relatively easy to agree with the broad principles for reform, there will be huge challenges in making those principles a reality. It is essential that we can demonstrate clearly that the proposals are implementable. In particular, we must guard against unintended, and undesired, consequences of reform, and must consider these reforms in the context of, for example, the Key Stage 3 Strategy and the Higher Education White Paper.

Secondly, it is clear that there is a wide acceptance that there is a distinct phase of learning for young people, which prepares them for higher education and employment. For many young people – but by no means all – that phase will start at 14 and end at 19: the reference to 14-19 reform is, therefore, a label, rather than a prescription. Equally, the phase must always be consistent with what precedes it, and what follows, and should encourage progression into the phase from Key Stage 3; progression through the phase; and have clear lines of progression into higher education or employment. In that context, most, if not all, local education authority areas now have 14-19 strategy groups, involving local LSCs and relevant partners. The early public response to the progress report, and comments on that report from a wide range of stakeholders, have been encouraging. Whilst the progress report does demonstrate the advantages that increased breadth in the curriculum will offer to those engaged already with the system, future reports will need to demonstrate clearly how the proposals will contribute to an attitudinal change by those young people whom the current system does not motivate to learn. For example, attitudinal change will be encouraged by: a core which commands the interest of young people through clearly providing the skills they need for employment and life; positive integration of well structured vocational programmes in specialist learning; and informed and impartial advice and guidance.

Thirdly, the progress report presents a powerful argument for a radical, and necessary, reform of the 14-19 curriculum, and demands and proposes a fresh approach to teaching and learning, and assessment. It will be important to retain a commitment to radical reform, and to develop an ever more compelling argument to present to those resistant to, or cautious about, change. It is essential that, in particular, higher education and employers accept the force of the argument for reform, and agree that the Working Group's proposals will deliver that reform. Fundamental to that reform is that the learner is at the heart of the system. All providers will need to be flexible in order to meet learner needs effectively and the system itself will need to offer genuine opportunities for flexibility and collaboration. This will be of particular importance in developing the pathways from Key Stage 3 and enhanced opportunities for work-related and work-based learning.

Finally, those radical reforms can be implemented successfully only by a highly skilled, professional and committed staff – teaching and support – in schools, colleges and learning providers. We would take this opportunity to express our confidence in the quality and commitment of those staff, and in their ability to deliver those reforms. We would urge, however, that Government should not impose on the goodwill of those staff, but should adequately resource the transition and should recognise the importance of the professional judgement of staff. Teaching and support staff will need to undertake substantial professional development at the same time as implementing radical reform: there are clear dangers of overstressing the capacity of staff to deliver. Indeed, one of the key features of successful initiatives in the past, and a key indicator of the likely success of these reforms, is the extent to which the reforms motivate the staff who are being asked to deliver them: the proposals in the progress report appear to have that potential.

The reforms will be supported by a range of initiatives already in place, such as the Skills Strategy and Success for All and associated Strategic Area Reviews, which seek to develop a quality-assured network of providers and support services.

For us, a key feature of any new arrangements must be that it is based on an entitlement curriculum. Young people must have realistic access to a broad-based curriculum offer of high-quality. What that offer actually comprises will vary between localities, but we will wish to work with other partners in developing an agreement about what should make up that offer.

Whilst the learner must be at the heart of any new arrangements, those new arrangements must also be relevant to, and understood by, a number of other partners. It is essential, therefore, that those partners are engaged fully and genuinely in the development of the 14-19 agenda nationally and locally, and feel ownership of the outcomes. In particular, it will be important to show that the needs of employers and of the economy have been considered fully.

It would be helpful if the future reports from the Working Group could show how the development of the proposals has taken account of the views of stakeholders, and in particular of young people and their parents. It will also be important to demonstrate how the framework will apply to, and be accessible to, all young people, including those with learning difficulties and/or disabilities or other barriers to learning and those who are disaffected or disengaged from learning.

The LSC believes that it should re-emphasise that it supports the radical proposals for change, but that they can only be implemented successfully if issues such as collaboration, support and guidance, and resources are addressed.

- Support and guidance for young people

Impartiality and quality of advice and guidance available to young people, in particular at age 13/14, is the key to the success of the proposals. Whilst it is right that we provide young people with greater choice, we must ensure that they know what options are available to them, and the implications of the choices they make.

The Government has created the opportunity to establish careers education and guidance firmly at the heart of the 14-19 curriculum. This will be absolutely central to the success of these reforms. The non-statutory framework for careers education and guidance is a helpful, and important, development, but we remain concerned that all Connexions Partnerships, whilst rightly focusing on those not in education, employment or training, should be resourced sufficiently to ensure that all young people receive appropriate advice and guidance. We also look for enhanced status and resource being accorded to careers education and guidance in all schools, colleges and learning providers.

In particular, it is important to ensure that high-quality, unbiased and impartial support and guidance is available not only for those on full-time routes, but also for the significant numbers of young people – currently up to 35% of 16-19 year olds – who wish to combine employment with their continuing education and training (most, but not all, of whom will be pursuing the Modern Apprenticeship route).

A key feature of the new proposals will be the extent to which they are attractive to those who are dropping out at Key Stage 4, or are in danger of not continuing in education, employment or training after 16 or of leaving learning before 19. Connexions Personal Advisers and staff in schools, colleges and learning providers will have a crucial role to play in making those young people aware of the opportunities available to them, and in helping them to identify coherent and relevant programmes across the range of learning and skills sectors.

It is important to recognise that young people receive advice from a wide variety of other sources, including their peers. It is essential, therefore, that the reformed curriculum is readily understood by parents, employers and young people themselves.

- Collaboration

The LSC considers that collaborative working between schools, colleges, learning providers and employers 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 quality. It will be particularly important to demonstrate the significant role for small and medium enterprises (SMEs), and how SMEs can engage effectively with this agenda. In particular, collaboration will provide the opportunity for employers to become directly involved with learning providers in the assessment and delivery of skills. Local LSCs, LEAs and Connexions

Partnerships have key roles in facilitating and supporting such collaboration, working with other agencies such as the Education Business Links Consortia and Sector Skills Councils.

The main strengths and advantages of collaboration are:

- a significantly broader curriculum offer
- a wide range of routes for progression
- ensuring the vocational and occupational relevance of provision
- protection for "minority" subjects
- increased cost-effectiveness
- stability in planning
- more balanced information about courses and progression
- increased opportunities for staff
- enhanced opportunities for use of ICT to support learning.

There are many excellent examples of collaborative working, including the 14-19 Pathfinders. There remain, however, significant challenges, including how to achieve effective quality assurance of the individual components of a collaborative partnership, and how to ensure access to a broad curriculum in rural areas. There are also issues about the delivery of support, advice and guidance in such arrangements.

- Resources

There are three main resource issues: staffing; funding; and providers.

Successful implementation and delivery of the reformed curriculum will depend on the availability of teaching and support staff with specialist and contemporary skills and knowledge. There will need to be changes in initial training for staff, and substantial professional development for existing staff. It may be helpful to the Working Group, in this context, to be aware that the LSC and DfES have responded to concerns about the education of 14-16 year olds in colleges or with learning providers. We have commissioned detailed guidance for colleges and learning providers, which will be available this Autumn, and are looking to develop suitable modules for the professional development of staff in those organisations who are working with 14-16 year olds.

One significant barrier is the difference in the pay, qualifications and conditions of service for staff employed in schools, colleges and learning providers – exposed more starkly by the encouragement of collaborative working. There are also issues of governance and statutory requirements on the different partners. Some progress has been made in recent years, but significant gaps still exist, and there is a continuing need for investment in the system. The outcomes of the forthcoming Spending Review will have a major impact on the deliverability of reform.

There will be costs associated with the introduction of wider choice from age 14, and costs associated with collaboration. Those costs will arise from: smaller class sizes and higher unit costs for vocational subjects 14-16; costs of supporting collaboration (including planning, transport and ICT); and in-service training for staff in schools, colleges and learning providers. We are gaining a good understanding of the costs of collaboration from the evaluation of the 14-19 Pathfinders and of the 14-16 Increased Flexibility Initiative. Costs associated with collaboration will, of course, be off-set in many cases by greater cost-effectiveness, both in initial group size and in reduction of drop-out, although it still needs to be recognised that collaboration does have a cost attached. There will also be associated capital costs. LEAs and schools with sixth forms have very quickly embraced the principles underpinning the LSC's funding methodology, and there may be value in the LSC working closely with LEAs and the DfES to achieve greater coherence in funding across the phase.

The opportunities which the progress report rightly believes should be offered to all young people relies on the availability of such opportunities in local areas. It will be important to ensure that existing provision is of the highest quality and to bring into engagement such new provision as is necessary. This will be particularly challenging in respect of work-related learning.

The Objectives of Reform

As one of the key underpinning principles of reform is that learning should be tailored to the needs of young people, we believe it is important to demonstrate clearly the central role of young people in determining their own learning programmes. It is important, also, to stress the need for high quality, unbiased and impartial support and guidance for young people, in order that their decisions are well-informed.

The criteria should address all those in learning, wherever that learning takes place, and should, for example, include young people under the protection of the courts, detained by order of the courts, in hospital, or being "educated otherwise".

Priorities for 14-19 Learning Programmes

We believe that the progress report does not acknowledge fully the strengths in the current system. Additional aspects to which we would draw attention are introduction of specialist status in schools, and of Centres of Vocational Excellence. The establishment and work of the Standards Units – for schools, colleges and learning providers, has reinforced the Government's focus on quality in provision, and Ministers have acknowledged that the teaching force is of the highest quality. Inspection reports demonstrate many examples of excellent, world class, teaching and learning across the range of learning settings. It is on this firm base that Success for All is building.

Whilst it is right to draw attention to the confusion for learners and key stakeholders of the current vocational offer, it is important that the Working Group acknowledges that employers in particular have expressed the view that some A levels could – and should – be more relevant to the world of work, without any dilution of standards. Equally, there is a need to provide a greater vocational focus in examinations such as the AVCE.

We do support the analysis that the increased number of GCSEs and AS subjects being studied by individual young people does not provide the sort of additional breadth of learning which we would wish to encourage. It may be helpful to acknowledge more explicitly the unintended, and sometimes undesired, impact of performance tables and funding methodologies. It would be useful to consider whether any similar risks are associated with the new arrangements.

Priorities for 14-19 Assessment Arrangements

This is a very important section of the progress report. We strongly support the analysis and the objectives.

In particular, we welcome the conclusion that it is not, necessarily, that there is too much assessment -- but that there may be inappropriate assessment, and that assessment is not embedded sufficiently in the specification of the programme of study.

We agree that what is important is to achieve the right balance between internal and external assessment, and between formative and summative assessment. In this way, assessment can be motivational and supportive of teaching and learning, rather than burdensome.

The nature of assessment is also important, and in particular the use of assessment techniques other than written examinations. Non-written examination may, for example, encourage the progress of kinaesthetic learners (amongst whom boys predominate).

It would be helpful, in the development of these proposals, to make reference to the increasing availability of self-assessment materials, and to demonstrate the important role of self-assessment.

It is good that the report recognises, in paragraph 37, that there will be a need for effective training of teachers and trainers.

Priorities for the 14-19 Qualifications Framework

We would broadly agree with the priority objectives for reform of the 14-19 qualifications framework. The objectives are described from the point of view of young people, which is helpful.

It is clearly important to be able to identify the personal strengths and preferred styles of learning of young people, and to match those to learning programmes. It may be helpful to make clear, also, the importance that learning styles should be appropriate to the learning programmes and should motivate the young person to continue in learning. Initial, and in-service, training for staff will be needed to ensure that they understand different learning styles, can identify the preferred learning styles of individual students and are able to adopt or develop an appropriate pedagogy.

One of the features of a new framework must be its ability to meet a broad range of objectives, reflecting the needs of learners and of a wide range of stakeholders.

The Overall Structure of 14-19 Programmes and Qualifications

We would strongly support the common template described in paragraph 47 for a young person's learning programme. In particular, we are pleased that the description of that programme begins with a general core of generic knowledge, skills and experience. Key features of learning programmes must be that they enable a young person: to "learn how to learn"; to develop critical thinking skills; and to reflect on their own learning.

One of the key challenges – both in the present arrangements and in these proposals -- is to ensure the coherence of these various elements into one learning package. For too many young people, learning is "compartmentalised", with limited appreciation of the interrelationship between the different elements. This is particularly the case with the key skills and generic skills.

Many potential learners – and particularly the disengaged – are deterred by the sheer diversity and complexity of offerings. There is a need to develop a clear branding framework to bring clarity of understanding and emotional commitment to all learning routes.

There are many examples of good, and excellent, teaching which integrates skills learning with other learning, but there will still be a need for in-service training and changes to initial training.

This does, however, reinforce the importance of the Connexions Partnerships and of high-quality careers education and guidance for young people at the commencement of, and continuing throughout, the 14-19 phase. The arrangements will still have to allow for an emphasis on breadth rather than specialist learning for some young people.

The ability, and depth, of specialist study will vary according to the level of study. In particular, there is discussion currently about whether occupationally specific programmes are appropriate at entry level and level 1, or whether provision at those levels should be more broadly vocational.

The proposals for 14-19 reform will have significant implications for education up to the age of 14 and also for education and training beyond the age of 19. In the case of generic skills, it is important to recognise that young people are encouraged to develop those skills in the primary school. The development of skills should, therefore, be cumulative throughout a young person's learning.

Again, we would stress on the need for skills development to be seen in context throughout a young person's learning programme, and to be seen as underpinning that learning. In particular, we must avoid giving the impression that the acquisition of skills is only, or primarily, a remedial activity, or that key skills are needed to level 2 only. Rather, we should stress the importance of high level skills for high level performance in learning and work.

However, the existing individual components – such as a GCSE – are often described as "qualifications". Getting public acceptance that the diploma is the qualification, and not its constituent parts, will present a major challenge. This must also be considered in the context of unitisation of programmes of study and the consequent rules of combination. It would be helpful, in later documents, to encourage debate about the use of the term "qualification", in order to seek to develop a common agreement of which existing, or new, programmes constitute a "qualification".

This will present one of the greatest challenges to achieving radical reform. If the framework is to have currency and credibility, it must replace the existing system for young people. However, around 5 million adults each year pursue some form of further education, and there will continue to be a huge demand for courses of the type on offer currently. The new framework for young people, therefore, is likely to have to develop its credibility and status whilst the current examination courses remain.

In addition, the role of some of those qualifications across different learning and skills sectors (and most notably in the context of Modern Apprenticeships) will need to be considered to ensure consistency across all sectors.

However, this will involve considerable advice and guidance for young people. The experience of Curriculum 2000, which is referred to in the progress report, demonstrates clearly the perfectly understandable preference for young people to choose to pursue programmes in which they are interested, and likely to be successful. Equally, performance tables encourage institutions to seek achievement of qualifications, rather than balance.

We believe that a fundamental principle of the new arrangements must be that the framework is available to all young people, and should be challenging to all young people. We therefore support strongly the differentiated model. Further consideration is needed on the use of the descriptors of entry, level 1, 2 and 3, or the terms "foundation", "intermediate" and "advanced", as the latter are used in a number of different contexts, and with different meanings. However, the numerical descriptors are not yet commonly accepted or understood, with confusion in particular between, for example, the

achievement of level 2 in an individual course and the achievement of level 2 by an individual student.

We believe it is essential that there is a record of achievement in individual components of the framework, with clear differentiation of performance in those individual components. However, we would caution against the introduction of “pass”, “merit” and “distinction”, or any other form of differentiation of the separate levels of the diploma, as this would lead to a potential of twelve different awards, and the accompanying confusion. In addition, three categories within the level 3 award would, in fact, provide less differentiation than is available currently at level 3.

Differentiation should not be seen solely in terms of final outcomes. There will be a need for differentiation also in respect of milestones during the 14-19 phase, and also in providing regular feedback to young people.

Whilst we would strongly support this proposal, we recognise that this will present significant challenges for some providers. Firstly, there is a capacity issue, whether individual providers will be able to offer not only an extended range of curriculum, but within that also different teaching and learning styles. The outcomes of Strategic Area Reviews will better inform us of the capacity of existing providers to deliver the new agenda and lay the foundations for a system of provision more attuned to delivering a wider curriculum. Whilst challenging, however, the “climbing frame” approach would offer learners the opportunity to re-assess their progress or aspirations, and provide “stepping stones” between levels of study and across the general/specialist curriculum.

The proposal for an extended research project or oral presentation, whilst having many attractions, is predicated on cross-curriculum working. This runs counter to a curriculum which has become increasingly compartmentalised. This approach will require improved advice and guidance for young people, and professional development for teachers and trainers. There are significant opportunities for institutional collaboration and cross-curriculum working in the emerging e-learning strategy.

It will be important to describe the “climbing frame” approach in ways which will be understood, and accepted, by all stakeholders, including young people and their parents, employers and higher education.

The implications of a “climbing frame” approach for the Modern Apprenticeship route – where it has the potential to provide greater flexibility in respect of access and incremental achievement – will also have to be considered carefully.

The progress report demonstrates throughout a sophisticated understanding to assessment. It will be important to ensure that young people, staff, parents and key stakeholders (including HE and employers) share that understanding. We would all share a concern that the current arrangements appear to promote the belief that the only worthwhile learning is that which is subject to a written, external, test. It will be challenging to move to a system which gives

equal value to activity which is assessed in other ways, not all of which involve written testing. In particular, this will require constant vigilance to ensure that the balance of assessment is accepted and retained, to develop new approaches, and to avoid the drift in assessment styles towards the “academic” which has been seen in the current arrangements. It is essential that assessment style is relevant to the programme being pursued – for example that programmes in the performing arts include assessment of performance.

The “climbing frame” approach will make it much more difficult for a young person to understand the progress they are making than the current arrangements. There will need to be regular progress checks for each element of a young person's programme, together with a formal review of progress in respect of their overall programme and formal recognition of achievement. It would be helpful to make clear that, following such a review, it would be perfectly reasonable for a young person to decide to re-balance their programme by remixing their overall programme and moving horizontally, diagonally or even to a lower rung on the climbing frame. This will have significant implications for Modern Apprenticeship frameworks and will need to take into account work underway already to ensure greater flexibility of access and accumulation of incremental achievement.

The progress report notes that “choice can rarely be wholly unfettered”. Indeed, we would suggest that choice can never be wholly unfettered. It is important, in promoting a flexible system with wide choice of curriculum and learning styles, that we do not unreasonably raise the expectations of young people.

On the other hand, there is currently no clear consensus about the minimum breadth to which a young person should be entitled. As the new agenda develops, it will be important for local LSCs and LEAs to work together to ensure that sufficient breadth of high-quality curriculum is available locally.

There will be a need to give guidance to young people on the impact of their decisions. This will include the identification of coherent “packages” which are most relevant to particular career or progression options, and identifying programmes which are essential, or highly desirable to particular options. It would be helpful to provide examples of individual young people's learning trajectories. We would wish to build a framework with ladders – but no snakes.

The Government's Skills Strategy, published in July 2003, includes a commitment to developing a credit framework for adults, and to consider credit frameworks for young people in the light of the Working Group's review. Credit, together with the introduction of a Unique Learner Number, would be of value to all learners across all learning and skills sectors, but would clearly be of significant value to those who move between institutions, or indeed undertake their learning at more than one situation.

Some key features of a credit framework are that:

- credit can be used to support longer term reforms to 14-19 qualifications framework
- credit can assist the development of progression and pathways into national qualifications and higher education
- credit allows recognition of small achievement as well as large and of achievement sets beyond or outside the qualifications framework
- overarching qualifications (such as being considered here) can be built by specifying thresholds in terms of rules of combinations of subjects and the level and credit value or volume of achievement required. Without a volume measure it is difficult to construct such qualifications
- credit has an important role in motivating young learners and recognising cumulative achievement rather than failure
- credit can facilitate and sustain progression and can stimulate flexibility of progress through, and achievement of, Modern Apprenticeship frameworks.

Again, credit will enable those who, for a variety of reasons, leave learning before 18/19 both to have their achievement recognised, and to be able to re-engage with learning at a later date without penalty. This would also seem essential for the cost-effective development of the new entitlement to level 2 for those over the age of 19, as set out in the Skills Strategy.

Credit also has the potential to recognise achievement and, in its application and award, assign currency to achievement at Entry level and Level 1 and in non-formal settings.

In theory, the diploma approach should reduce the notion of a break-point at 16. This ambition might be compromised if, for example, large numbers of young people continue to sit GCSE examinations across a range of subjects in May/June each year. It will be important to provide models of how the new arrangements will operate in practice.

The LSC would wish all young people to remain in structured learning (which includes learning in a work-setting) until 19. However, there may be a small number of young people for whom, for a variety of reasons, a break from learning, or a reduction in the hours of learning, at some stage between 16 and 19 is in their best interests – this may be, for example, for health or family reasons. Whilst we would wish to develop a system which motivates young people to remain in learning, we would equally wish to avoid penalising young people whose personal circumstances prevent that happening.

We would support and encourage young people to develop balanced programmes of learning. The diploma approach clearly enables a young person to put together a balanced programme, but would only ensure a

balanced programme if there was some element of compulsion and a clear sense of coherence and purpose in rules of combination of packages of learning. There are inevitable tensions between compulsion and motivation, and only through skilled advice and guidance will young people develop programmes which are balanced and motivational. Unless performance tables are changed significantly, there will remain a pressure for institutions to guide students towards achievement, rather than balance.

We agree with a view that the existing examinations should be retained -- though streamlined to remove unnecessary duplication and those which are an inappropriate measure of achievement in some subjects and sectors. Retention of those examinations has, however, benefits and drawbacks. The benefits would seem to be to give high status to a diploma which is based on existing high status examinations. The drawbacks would seem to be that selection would still be undertaken by some higher education institutions and employers on the basis of those existing examinations.

One significant advantage of the diploma over the existing framework is that, through its inclusion of supplementary learning and wider activity, it focuses on what a young person can do, and has achieved, rather than identifying failure.

The currency of the diploma will depend crucially on timing. Put simply, the diploma will have little status or currency unless HE admission is dependent on the achievement of a diploma at level 3; and that employer recruitment uses the diploma as a key tool, rather than individual components. It will be important, again, to give examples of how, and when, the diploma might be awarded.

There have been recent suggestions from some HE institutions about the possible introduction of additional tests, in response to concerns that applicants are not able to demonstrate adequately their aptitude for learning. Those concerns about the current system will be helpful in informing the development of the new arrangements.

The progress report demonstrates throughout a sophisticated understanding of assessment. It will be important to ensure that young people, staff, parents and key stakeholders (including HE and employers) share that understanding.

Extending the range of programmes available, and increasing the flexibility with which those programmes can be approached, will make it more difficult to assess the value added by an institution to a young person's learning. Such measures will, however, continue to be important indicators.

PART 2 – THE NEXT PHASE OF THE REVIEW

It is helpful that the progress report has focused on the design principles which should underpin the new arrangements, and we support fully those principles. However, it seems to the LSC that the next phase of the review will need also to address issues of delivery.

The list of issues which follows – some of which have been raised earlier in this response – will not be comprehensive, but does give an indication of the scale of the challenge. In many cases, the LSC, at national and local level, is already taking a lead, or supporting other partners, in developing new approaches. It will be important to demonstrate that the Working Group is aware of the issues which will need to be addressed, and is confident that those issues can be addressed successfully within the timescale for reform.

Culture

The existing arrangements result, for many young people, in compartmentalised learning, with insufficient recognition of interrelationship between programmes. Thus, in many institutions, ICT is seen as a separate subject, or is an integral aspect of learning in only a limited number of subjects. Similar experiences have been demonstrated in Citizenship and work-related learning. Moving to a single qualification, to which each individual learning aim contributes, will require a substantial cultural shift. In particular, it will be important to overcome a deep-seated culture which distinguishes and imposes a hierarchy to academic, vocational and occupational learning.

Defining the entitlement

There is a need to make clear the minimum offer which a young person should expect to be available. That offer will comprise learning programmes (with clear progression routes), wider activities, and support and guidance. There may be merit in considering a Young Person's Learning Charter which would be applicable across all learning and skills sectors.

It will be important to demonstrate – possibly through the work of the 14-19 Pathfinders – how an entitlement curriculum can be offered in a variety of settings, including in particular in rural areas.

Guidance

The new framework for Careers Education and Guidance (CEG), and the continued development of the Connexions Service, will help to ensure that young people are better informed and advised, but the increased flexibility proposed in these reforms will impose greater burdens on those providing that

advice. It is important that all partners are clear about, and able to meet, their own responsibilities, particularly in the context of collaborative working.

Provision varies greatly between, and within, institutions, as does the status accorded to CEG. It might be helpful to remind schools and colleges about, and to promote, the Quality Award for CEG, and to ensure that schools, and Connexions Partnerships, are clear about their respective roles, and are adequately resourced. It will also be important for Connexions Partnerships to work with learning providers to ensure that all young people have access to high quality information and guidance.

Recognition of wider activities

The development of a young person's personal interests, whether in sports, arts, volunteering or other activities, is an important element in their development. A young person's engagement in such activity can often be informed by, and make a vital contribution to, their learning.

It is important that such activity is recognised and valued. However, not least because of the very personal nature of such activity, any suggestions for assessment or accreditation should be approached with great caution. The award of diplomas at different levels might be seen to imply different minimum levels of engagement in personal interests. One danger of such an approach is that, rather than encouraging and motivating, it may, for some young people, reinforce existing low levels of confidence or self-esteem.

We are working already with the Network for Accrediting Young People's Achievement on how to give currency to awards and activities in informal educational settings.

Capacity

There are concerns about the capacity of the system to deliver current initiatives. The Modern Apprenticeship reforms and the introduction of GCSEs in vocational subjects, are already, in some localities, raising capacity issues. Whilst joint planning and working between schools, colleges, learning providers and employers can help, those issues must still be acknowledged and addressed. Those issues are in three parts: the availability of suitably qualified and experienced staff; and the availability of specialist accommodation and equipment; and the ability of employers to offer MA placements. It will be important to model the new arrangements at an early stage in order to identify potential shortages, both immediately and as the new arrangements are introduced across the age range.

Professional development

There will be a significant need for professional development for existing teachers and trainers, and changes to the specifications for initial training. We

have, as indicated earlier, begun already to discuss these issues with key partners. There will also be a need for professional development for those supporting learning, including Connexions Personal Advisers.

Timescales

The Government has rightly stressed that change will be introduced at a measured pace. If, as we believe, the new arrangements strike a chord with, in particular, young people, teachers, trainers, it would seem likely to us that there will be significant pressure from institutions for faster progress in some aspects of reform – pressure which we would not wish to resist. A phased introduction will also raise the possibility of confusion. It will be important to have clear milestones and a programme of change management.

Assessment

The proposals for changes to the balance of assessment will have implications for the awarding bodies. Those implications may not necessarily be threatening, if the total amount of assessment remains broadly the same. Staff will require advice, guidance and materials in order to undertake successfully, and without undue burden, the more sophisticated forms of assessment the progress report envisages. It will be important to engage with the Awarding Bodies at an early stage.

In particular, it will be important to demonstrate both the costs and the benefits of e-assessment and assessment in the workplace.

Some uses for e-assessment might include:

- diagnostic assessment throughout the 14-19 phase and in particular to identify levels of generic skills. Electronically delivered and marked diagnostic tests for key skills are already available. The use of simulated environments, as in the Key Stage 3 ICT tests can be helpful in moving away from the 'exam environment'
- individual learning plans will require a degree of accurate informal student tracking. The use of electronic methods of formative assessment accessed when ready enables the easy development of a portable record of learner achievement and engagement. With the potential of multiple learning locations, the portability of this record is vital: this is being considered already in the context of Entry to Employment and the "E2E Passport"
- e-portfolios, driven both by demand in schools and colleges, and by the Awarding Bodies enables the portable storage of evidence in multiple formats accessible to learner, teacher and

assessor simultaneously. Digital video or audio files can more accurately record skills than a theoretical paper, for example.

Ownership

One of the most significant features of the Working Group has been the way in which the main group and the subgroups have included, and engaged with, a wide range of stakeholders. It will be important for that approach to be embedded both as the proposals are taken forward, and in the arrangements which are put in place for those proposals to be implemented and delivered.

In particular, in taking the work forward it will be important to engage with work based learning providers, employers and sector bodies, for whom in particular the new arrangements will present challenges and opportunities.

Integrating different routes

All young people should have the opportunity and entitlement to achieve the diploma, across all learning and skills sectors. It will be important to consider the particular implications of these proposals for each of those sectors.

It will be important for the Working Group to work closely with the Modern Apprenticeship Task Force in order to understand the implications for MAs of the emerging recommendations.

There will still be some young people whose personal circumstances will impact on their ability to pursue the type of learning experience which is envisaged. It will be important to show how the new arrangements will address the needs of those young people, including, and building on, existing work on Entry to Employment, and to confirm that the diploma can be completed or upgraded after the age of 19.

It will be important to demonstrate that the new arrangements can be delivered effectively to young people with learning difficulties and/or disabilities.

Credit

The proposals will depend on the development of a credit system, and on a system which can record the achievement of credit and give value to the application of credit. Such a system would be impractical without the introduction of a universal Unique Learner Number

Performance tables

The proposals will impact on performance tables. Whether published or not, both individual institutions, and collaborative partnerships, will wish to be able

to understand and measure their performance including the value they add to a young person's learning. Providers of education and training must be accountable publicly for their performance. We would welcome the development of area-based performance measures across post-16 learning. The measures used should be consistent across all types of provider and should cover the full range of provision. A radical change in the nature and delivery of the curriculum 14-19 may mean that some existing performance indicators are no longer relevant, or do not accurately reflect actual performance.

Engaging young people/ employers/HE

The development of arrangements which appeal to young people, employers and HE will be done most effectively if it is undertaken with the active involvement of those stakeholders. There is much good and effective practice, including the 14-19 Pathfinders, P4P Aim Higher Partnerships, Excellence Challenge and projects on progression from AMA to HE.

The DfES was rightly praised for the efforts it made to ensure that young people were aware of, and were able to respond to, the 14-19 Green Paper. The LSC also sought the views of young people when preparing its response to the Green Paper, and we would urge a similar approach to the consultation on the Working Group's interim report.

Adult learning

The proposals are for those aged 14-19. There will, therefore, be many adult learners who are pursuing courses which do not constitute a diploma, but are elements of the diploma. It will be important to maintain the status of those courses and programmes, as valid courses of study in their own right.

Planning

The LSC shares with local education authorities the responsibility for planning the 14-19 phase. Whilst this does give rise to potential confusions, those are being overcome by goodwill and an acknowledgement that we should work together in the best interests of young people.

Comparative data must be collected in standard formats and be readily accessible to LSCs and LEAs to enable them to fulfil their responsibilities.

It will be important to make clear the respective powers and responsibilities of LSCs and LEAs, and to consider whether changes are needed to the existing statutory framework.

Funding

The LSC is, of course, also a funding Council, and will at some stage have to consider the funding implications of the proposals. It is perhaps important that we make clear that we see the funding methodology being driven by the needs of learners, rather than learning programmes or the behaviour of providers being dictated by funding.

RESPONSE TO THE SPECIFIC QUESTIONS

Question 1: Do you broadly agree or disagree with the criteria in paragraph 10 for a reformed 14-19 framework?

☒ 1 Strongly agree

The individual bullet points appear appropriate to the development of a 14-19 framework.

As one of the key underpinning principles of reform is that learning should be tailored to the needs of young people, we believe it is important to demonstrate clearly the central role of young people in determining their own learning programmes. It is important, also, to stress the need for high quality, unbiased and impartial support and guidance for young people, in order that their decisions are well-informed.

The criteria should address all those in learning, wherever that learning takes place, and should, for example, include young people under the protection of the courts, detained by order of the courts, in hospital, or being "educated otherwise".

Our detailed comments on the overall structure for 14-19 programmes and qualifications are provided in response to later questions.

Question 2: Do you broadly agree or disagree with the priority objectives we have identified in Section C for reform of 14-19 learning programmes?

☒ 1 Strongly agree

We believe that the progress report does not acknowledge fully the strengths in the current system. Additional aspects to which we would draw attention are introduction of specialist status in schools, and of Centres of Vocational Excellence. The establishment and work of the Standards Units – for schools, colleges and learning providers, has reinforced the Government's focus on quality in provision, and Ministers have acknowledged that the teaching force is of the highest quality. Inspection reports demonstrate many examples of excellent, world class, teaching and learning across the range of learning settings. It is on this firm base that Success for All is building.

Whilst it is right to draw attention to the confusion for learners and key stakeholderers of the current vocational offer, it is important that the Working Group acknowledges that employers in particular have expressed the view

that some A levels could – and should – be more relevant to the world of work, without any dilution of standards. Equally, there is a need to provide a greater vocational focus in examinations such as the AVCE.

We do support the analysis that the increased number of GCSEs and AS subjects being studied by individual young people does not provide the sort of additional breadth of learning which we would wish to encourage. It may be helpful to acknowledge more explicitly the unintended, and sometimes undesired, impact of performance tables and funding methodologies. It would be useful to consider whether any similar risks are associated with the new arrangements.

In paragraph 20, there is reference to the 50% of young people who "fail" at 16. For many of those young people, disaffection begins much earlier -- often at, or before, they reach the age of 14. It is important, therefore, to recognise the implications on teaching, learning and assessment during Key Stage 3 of these reforms.

Question 3: Do you broadly agree or disagree with the priority objectives we have identified in Section D for reform of 14-19 assessment arrangements?

☒ 1 Strongly agree

This is a very important section of the progress report. We strongly support the analysis and the objectives.

In particular, we welcome the conclusion that it is not, necessarily, that there is too much assessment -- but that there may be inappropriate assessment, and that assessment is not embedded sufficiently in the specification of the programme of study.

We agree that what is important is to achieve the right balance between internal and external assessment, and between formative and summative assessment. In this way, assessment can be motivational and supportive of teaching and learning, rather than burdensome.

The nature of assessment is also important, and in particular the use of assessment techniques other than written examinations. Non-written examination may, for example, encourage the progress of kinaesthetic learners (amongst whom boys predominate).

It would be helpful, in the development of these proposals, to make reference to the increasing availability of self-assessment materials, and to demonstrate the important role of self-assessment.

It is good that the report recognises, in paragraph 37, that there will be a need for effective training of teachers and trainers.

Question 4: Do you broadly agree or disagree with the priority objectives we have identified in Section E for reform of the 14-19 qualifications framework?

☒ 1 Strongly agree

We would broadly agree with the priority objectives for reform of the 14-19 qualifications framework. The objectives are described from the point of view of young people, which is helpful.

It is clearly important to be able to identify the personal strengths and preferred styles of learning of young people, and to match those to learning programmes. It may be helpful to make clear, also, the importance that learning styles should be appropriate to the learning programmes and should motivate the young person to continue in learning. Initial, and in-service, training for staff will be needed to ensure that they understand different learning styles, can identify the preferred learning styles of individual students and are able to adopt or develop an appropriate pedagogy.

One of the features of a new framework must be its ability to meet a broad range of objectives, reflecting the needs of learners and of a wide range of stakeholders.

Question 5: Do you agree or disagree that the approach outlined in paragraph 47 covers the strands of learning which should be present in all 14-19 programmes?

☒ 1 Strongly agree

We would strongly support the common template described in paragraph 47 for a young person's learning programme. In particular, we are pleased that the description of that programme begins with a general core of generic knowledge, skills and experience. Key features of learning programmes must be that they enable a young person: to "learn how to learn"; to develop critical thinking skills; and to reflect on their own learning.

One of the key challenges – both in the present arrangements and in these proposals – is to ensure the coherence of these various elements into one learning package. For too many young people, learning is "compartmentalised", with limited appreciation of the interrelationship between the different elements. This is particularly the case with the key skills and generic skills.

Many potential learners – and particularly the disengaged – are deterred by the sheer diversity and complexity of offerings. There is a need to develop a clear branding framework to bring clarity of understanding and emotional commitment to all learning routes.

There are many examples of good, and excellent, teaching which integrates skills learning with other learning, but there will still be a need for in-service training and changes to initial training.

Question 6: Do you agree or disagree that the emphasis on specialist learning should generally increase as learners move towards the end of the 14-19 phase (paragraph 49)?

☒ 1 Strongly agree

This does, however, reinforce the importance of the Connexions Partnerships and of high-quality careers education and guidance for young people at the commencement of, and continuing throughout, the 14-19 phase. The arrangements will still have to allow for an emphasis on breadth rather than specialist learning for some young people.

The ability, and depth, of specialist study will vary according to the level of study. In particular, there is discussion currently about whether occupationally specific programmes are appropriate at entry level and level 1, or whether provision at those levels should be more broadly vocational.

Question 7: Do you agree or disagree that earlier, more effective delivery of generic skills should be a high priority within a reformed 14-19 framework (paragraphs 50 and 51)?

☒ 1 Strongly agree

The proposals for 14-19 reform will have significant implications for education up to the age of 14 and also for education and training beyond the age of 19. In the case of generic skills, it is important to recognise that young people are encouraged to develop those skills in the primary school. The development of skills should, therefore, be cumulative throughout a young person's learning.

Again, we would stress on the need for skills development to be seen in context throughout a young person's learning programme, and to be seen as underpinning that learning. In particular, we must avoid giving the impression that the acquisition of skills is only, or primarily, a remedial activity, or that key skills are needed to level 2 only. Rather, we should stress the importance of high level skills for high level performance in learning and work.

Question 8: Do you agree or disagree with the following features of the qualifications model in paragraphs 54 and 55:

a. A framework of diplomas which recognises a whole programme with a single qualification?

☒ 2 Agree

However, the existing individual components – such as a GCSE – are often described as "qualifications". Getting public acceptance that the diploma is the qualification, and not its constituent parts, will present a major challenge. This must also be considered in the context of unitisation of programmes of study and the consequent rules of combination. It would be helpful, in later documents, to encourage debate about the use of the term "qualification", in order to seek to develop a common agreement of which existing, or new, programmes constitute a "qualification".

b. The framework should replace the existing qualifications taken by young people?

☒ 2 Agree

This will present one of the greatest challenges to achieving radical reform. If the framework is to have currency and credibility, it must replace the existing system for young people. However, around 5 million adults each year pursue some form of further education, and there will continue to be a huge demand for courses of the type on offer currently. The new framework for young people, therefore, is likely to have to develop its credibility and status whilst the current examination courses remain.

In addition, the role of some of those qualifications across different learning and skills sectors (and most notably in the context of Modern Apprenticeships) will need to be considered to ensure consistency across all sectors.

c. A required balance of specialist, general and supplementary learning?

☒ 1 Strongly agree

However, this will involve considerable advice and guidance for young people. The experience of Curriculum 2000, which is referred to in the progress report, demonstrates clearly the perfectly understandable preference for young people to choose to pursue programmes in which they are interested, and likely to be successful. Equally, performance tables encourage institutions to seek achievement of qualifications, rather than balance.

d. Awards at all levels from entry level to level 3 ?

☒ 1 Strongly agree

We believe that a fundamental principle of the new arrangements must be that the framework is available to all young people, and should be challenging to all young people. We therefore support strongly the differentiated model. Further consideration is needed on the use of the descriptors of entry, level 1,

2 and 3, or the terms “foundation”, “intermediate” and “advanced”, as the latter are used in a number of different contexts, and with different meanings. However, the numerical descriptors are not yet commonly accepted or understood, with confusion in particular between, for example, the achievement of level 2 in an individual course and the achievement of level 2 by an individual student.

e. Differentiation of performance in individual components of the diploma to help inform selection processes?

☒ 2 Agree

We believe it is essential that there is a record of achievement in individual components of the framework, with clear differentiation of performance in those individual components. However, we would caution against the introduction of “pass”, “merit” and “distinction”, or any other form of differentiation of the separate levels of the diploma, as this would lead to a potential of twelve different awards, and the accompanying confusion. In addition, three categories within the level 3 award would, in fact, provide less differentiation than is available currently at level 3.

Differentiation should not be seen solely in terms of final outcomes. There will be a need for differentiation also in respect of milestones during the 14-19 phase, and also in providing regular feedback to young people.

Question 9: Do you agree or disagree with our view that a framework of diplomas should offer learners an extended range of styles and types of learning, settings and experiences as well as options for additional subject study (paragraphs 57-59)?

☒ 1 Strongly agree

Whilst we would strongly support this proposal, we recognise that this will present significant challenges for some providers. Firstly, there is a capacity issue, whether individual providers will be able to offer not only an extended range of curriculum, but within that also different teaching and learning styles. The outcomes of Strategic Area Reviews will better inform us of the capacity of existing providers to deliver the new agenda and lay the foundations for a system of provision more attuned to delivering a wider curriculum. Whilst challenging, however, the “climbing frame” approach would offer learners the opportunity to re-assess their progress or aspirations, and provide “stepping stones” between levels of study and across the general/specialist curriculum.

The proposal for an extended research project or oral presentation, whilst having many attractions, is predicated on cross-curriculum working. This runs counter to a curriculum which has become increasingly compartmentalised. This approach will require improved advice and guidance for young people, and professional development for teachers and trainers. There are significant

opportunities for institutional collaboration and cross-curriculum working in the emerging e-learning strategy.

It will be important to describe the “climbing frame” approach in ways which will be understood, and accepted, by all stakeholders, including young people and their parents, employers and higher education.

The implications of a “climbing frame” approach for the Modern Apprenticeship route – where it has the potential to provide greater flexibility in respect of access and incremental achievement – will also have to be considered carefully.

Question 10: Do you agree or disagree with our view of the opportunities offered by a system of programme-level diplomas for more varied styles and volumes of assessment (paragraphs 60 and 61)?

☒ 1 Strongly agree

The progress report demonstrates throughout a sophisticated understanding to assessment. It will be important to ensure that young people, staff, parents and key stakeholders (including HE and employers) share that understanding. We would all share a concern that the current arrangements appear to promote the belief that the only worthwhile learning is that which is subject to a written, external, test. It will be challenging to move to a system which gives equal value to activity which is assessed in other ways, not all of which involve written testing. In particular, this will require constant vigilance to ensure that the balance of assessment is accepted and retained, to develop new approaches, and to avoid the drift in assessment styles towards the “academic” which has been seen in the current arrangements. It is essential that assessment style is relevant to the programme being pursued – for example that programmes in the performing arts include assessment of performance.

Question 11: How much importance do you attach to each of the factors listed in paragraphs 63 and 64:

a. Providing clear milestones during the 14-19 phase ?

☒ A lot

The “climbing frame” approach will make it much more difficult for a young person to understand the progress they are making than the current arrangements. There will need to be regular progress checks for each element of a young person's programme, together with a formal review of progress in respect of their overall programme and formal recognition of achievement. It would be helpful to make clear that, following such a review, it would be perfectly reasonable for a young person to decide to re-balance their programme by remixing their overall programme and moving horizontally, diagonally or even to a lower rung on the climbing frame. This will have

significant implications for Modern Apprenticeship frameworks and will need to take into account work underway already to ensure greater flexibility of access and accumulation of incremental achievement.

The introduction of credit will enable young people to understand clearly what they have achieved in those aspects of their programme.

b. Giving young people as much choice as possible over the content and breadth of their learning?

☒ A lot

The progress report notes that "choice can rarely be wholly unfettered". Indeed, we would suggest that choice can never be wholly unfettered. It is important, in promoting a flexible system with wide choice of curriculum and learning styles, that we do not unreasonably raise the expectations of young people.

On the other hand, there is currently no clear consensus about the minimum breadth to which a young person should be entitled. As the new agenda develops, it will be important for local LSCs and LEAs to work together to ensure that sufficient breadth of high-quality curriculum is available locally.

There will be a need to give guidance to young people on the impact of their decisions. This will include the identification of coherent "packages" which are most relevant to particular career or progression options, and identifying programmes which are essential, or highly desirable to particular options. It would be helpful to provide examples of individual young people's learning trajectories. We would wish to build a framework with ladders – but no snakes.

c. Certifying the achievement of those who move between institutions during their 14-19 learning?

☒ A lot

The Government's Skills Strategy, published in July 2003, includes a commitment to developing a credit framework for adults, and to consider credit frameworks for young people in the light of the Working Group's review. Credit, together with the introduction of a Unique Learner Number, would be of value to all learners across all learning and skills sectors, but would clearly be of significant value to those who move between institutions, or indeed undertake their learning at more than one situation.

Some key features of a credit framework are that:

- credit can be used to support longer term reforms to 14-19 qualifications framework

- credit can assist the development of progression and pathways into national qualifications and higher education
- credit allows recognition of small achievement as well as large and of achievement sets beyond or outside the qualifications framework
- overarching qualifications (such as being considered here) can be built by specifying thresholds in terms of rules of combinations of subjects and the level and credit value or volume of achievement required. Without a volume measure it is difficult to construct such qualifications
- credit has an important role in motivating young learners and recognising cumulative achievement rather than failure
- credit can facilitate and sustain progression and can stimulate flexibility of progress through, and achievement of, Modern Apprenticeship frameworks.

d. Certifying the achievement of those who leave learning before 18/19?

☒ A lot

Again, credit will enable those who, for a variety of reasons, leave learning before 18/19 both to have their achievement recognised, and to be able to re engage with learning at a later date without penalty. This would also seem essential for the cost-effective development of the new entitlement to level 2 for those over the age of 19, as set out in the Skills Strategy.

Credit also has the potential to recognise achievement and, in its application and award, assign currency to achievement at Entry level and Level 1 and in non-formal settings.

e. Reducing the impact of the potential break-point at 16?

☒ A lot

In theory, the diploma approach should reduce the notion of a break-point at 16. This ambition might be compromised if, for example, large numbers of young people continue to sit GCSE examinations across a range of subjects in May/June each year. It will be important to provide models of how the new arrangements will operate in practice.

The LSC would wish all young people to remain in structured learning (which includes learning in a work-setting) until 19. However, there may be a small number of young people for whom, for a variety of reasons, a break from learning, or a reduction in the hours of learning, at some stage between 16

and 19 is in their best interests – this may be, for example, for health or family reasons. Whilst we would wish to develop a system which motivates young people to remain in learning, we would equally wish to avoid penalising young people whose personal circumstances prevent that happening.

f. Ensuring balanced programmes of general, specialist and supplementary learning?

☒ A lot

We would support and encourage young people to develop balanced programmes of learning. The diploma approach clearly enables a young person to put together a balanced programme, but would only ensure a balanced programme if there was some element of compulsion and a clear sense of coherence and purpose in rules of combination of packages of learning. There are inevitable tensions between compulsion and motivation, and only through skilled advice and guidance will young people develop programmes which are balanced and motivational. Unless performance tables are changed significantly, there will remain a pressure for institutions to guide students towards achievement, rather than balance.

g. Ensuring status and currency for the diploma?

☒ A lot

We agree with a view that the existing examinations should be retained -- though streamlined to remove unnecessary duplication and those which are an inappropriate measure of achievement in some subjects and sectors. Retention of those examinations has, however, benefits and drawbacks. The benefits would seem to be to give high status to a diploma which is based on existing high status examinations. The drawbacks would seem to be that selection would still be undertaken by some higher education institutions and employers on the basis of those existing examinations.

One significant advantage of the diploma over the existing framework is that, through its inclusion of supplementary learning and wider activity, it focuses on what a young person can do, and has achieved, rather than identifying failure.

The currency of the diploma will depend crucially on timing. Put simply, the diploma will have little status or currency unless HE admission is dependent on the achievement of a diploma at level 3; and that employer recruitment uses the diploma as a key tool, rather than individual components. It will be important, again, to give examples of how, and when, the diploma might be awarded.

There have been recent suggestions from some HE institutions about the possible introduction of additional tests, in response to concerns that

applicants are not able to demonstrate adequately their aptitude for learning. Those concerns about the current system will be helpful in informing the development of the new arrangements.

h. More flexible, manageable assessment?

☒ A lot

As indicated in response to question 10, the progress report demonstrates throughout a sophisticated understanding of assessment. It will be important to ensure that young people, staff, parents and key stakeholders (including HE and employers) share that understanding.

Extending the range of programmes available, and increasing the flexibility with which those programmes can be approached, will make it more difficult to assess the value added by an institution to a young person's learning. Such measures will, however, continue to be important indicators.