

# Study programmes for 16 to 19 year olds

## Response of the Association of School and College Leaders

### A Introduction

- 1 The Association of School and College Leaders (ASCL) represents over 16,000 members of the leadership teams of maintained and independent schools and colleges throughout the UK. This places the association in a unique position to see this initiative from the viewpoint of the leaders of both secondary schools and colleges.
- 2 ASCL welcomes the intention in the proposals that all students should follow a coherent study programme regardless of the level they are studying at. We wholly agree that all young people should be on courses that support and stretch them, and enable them to progress onto the next level of learning or into employment. If well-planned and carefully implemented, this approach can develop a high degree of relevance and progression for young people. It will also be important to ensure that flexibilities are allowed within 16-19 programme-planning to ensure that the individual needs of students are met.
- 3 However, this consultation lacks detail in a number of areas without which we cannot fully endorse these proposals. ASCL considers that it will be important to consult on these matters of detail to ensure that there is clarity in understanding the terminology and definitions used in this consultation and that the principles are deliverable in practice.
- 4 This consultation response should be read alongside our response to the YPLA consultation on the 16-19 funding formula review. It will also be important to consider the policies in the BIS consultation *New Challenges, New Chances: Next Steps in Implementing the Further Education Reform Programme*. It is essential that the two departments' approaches are aligned; at the moment there are areas in which the departmental policies lack congruence.
- 5 One of the key areas vital for appropriate programme choice by young people is information, advice and guidance (IAG). This is only touched on in this consultation. ASCL has considerable concerns that IAG is very variable across the country and would strongly suggest that more reference should be given to IAG in supporting the study programme principles. We have concerns that there is a lack of coherence to government policy for IAG and that the funding restrictions in this area will have a detrimental effect on the government's good intentions to have all students on a relevant, appropriate programme 16-19.

## **B 16-19 study programmes principles**

- 6 The consultation appears mainly directed at those students following vocational programmes as there is a significant lack of reference to AS and A level courses throughout the document. It is important that all programmes including AS and A-levels are covered within the principles.
- 7 ASCL believes that the principles should include what is expected within the curriculum, breadth, balance and the range of experiences for those students following a mainly AS/A level programme.
- 8 We have commented in the introduction about the lack of detail in this consultation. Examples include:
  - the lack of definition of “substantial size” for qualifications in 4.10
  - no explanation of what makes a programme “coherent” in 4.12
  - no guidance on the degree of flexibility to depart from the study programme framework for individual learners in 5.1

Whilst ASCL welcomes an approach that “... trusts providers to use their professional judgement” as stated in 5.1, this should occur within a framework that does not make institutions vulnerable to criticisms through accountability measures because of different interpretations of terminology. The information that is shared with OFSTED as indicated in 5.5 must also be made available to providers to avoid potential problems during inspections.

- 9 It is indicated in 5.4 that there is a link between the study programme principles and the funding methodology. There are major issues here for those institutions that deliver high contact programmes, for example where students follow five AS/A levels or the International Baccalaureate. The funding methodology should reflect the fact that some programmes will of necessity have a higher contact time.
- 10 Whereas it seems reasonable to indicate that the standard full-time programme will be 600 guided learning hours (glh) the reality for schools and colleges will not be the designated glh for the programme but the amount of teacher contact time that the level of funding allows.
- 11 Bringing all funding down to a single standard size full-time programme has inherent risks. The consultation document strongly criticises perverse incentives in the previous system but its proposals create a risk that excellent programmes that currently serve some students well will be reduced to the standard size and no longer fully meet the needs of those students.
- 12 There is no incentive for institutions to deliver programmes near the top of any funding band. In essence the funding level will dictate the size of programme delivered.
- 13 These proposals also run the risk that some providers will not run expensive programmes, instead concentrating on areas that are more cost-effective to deliver. ASCL believes that great care is required to ensure that revisions in the funding methodology do not create a new set of perverse incentives.

- 14 It is indicated in 5.5 that providers will be judged on their results as reported in the performance tables which are currently under review. ASCL considers it essential that institutions are informed of what will appear in the performance tables in advance of students starting their programmes.
- 15 ASCL supports the move to include measures of attainment at levels 2 and 3 and progress measures. We remain unconvinced that data on destinations will be sufficiently robust to be used in performance tables. Our concerns relate to the publication of data that may well be significantly inaccurate. This becomes even more of a concern should this data be used to make judgements about the relative success of the institution.
- 16 A number of institutions educate students studying below level 2 and it will be important to recognise their success in not only moving these students up to level 2 but also through other progression routes.
- 17 It is also wholly inappropriate to judge providers only on what is reported in performance tables. In 4.12 it states clearly that “programmes.... can include both qualification driven and non-qualification activity”. In making judgements about institutions the overall quality of all aspects of study programmes, including IAG and the additional opportunities offered by the school or college should be taken into account.
- 18 Paragraph 5.5 emphasises English and mathematics but is silent on the more fundamental competences of literacy and numeracy, a point we will return to in section E (paragraphs 26-34) below.
- 19 The principles focus mainly on those students who will be working on level 2 and level 3 programmes. The vast majority of the students are already on excellent programmes that ensure appropriate progression to further study, work-related learning or employment. One of the key target areas must be those students who are NEET or at risk of being NEET and many of these young people will be on programmes below level 2. It would therefore be helpful to see an equal emphasis within the principles on these students.

## **C Tailoring for part time students**

- 20 There will need to be some pro rata scaling for part time students. Again we would make the point that it is not the scaling on the glh that is important but the impact of scaled funding on the ability for schools and colleges to deliver the appropriate programme.
- 21 In paragraph 7 we indicate a need to define a “substantive size of qualification” for full-time students; there will need to be a scaled-down version of smaller size for part-time students.

## **D Impact on different providers**

- 22 The major issue is not one of programme delivery but of level of funding to deliver the programme, as this will have a variable impact on different institutions. Larger institutions clearly have some advantages in terms of economies of scale, for example by increasing the size of teaching groups

whereas others such as small school sixth forms may find that there is a restriction in subject choice because of funding constraints.

- 23 Funding restrictions could also reduce the range of non-qualification activities provided by institutions, including work placements.
- 24 The currently proposed reduction in 16-19 funding will in itself have a major impact on the ability of small sixth forms to continue to deliver their current range of provision. It will be important that any change in funding caused by a move to funding programmes rather than individual qualifications does not exacerbate the impact of the proposed reductions.
- 25 ASCL considers that the proposed reductions in funding will have a hugely detrimental impact across the whole 16-19 sector in terms of student outcomes.

## **E Studying English and mathematics post-16**

- 26 ASCL fully supports the view that obtaining a GCSE grade A\*-C in both English and mathematics is very important for all young people. We do however have concerns if the intention is that all of those without this qualification at 16 should continue attempts to obtain a GCSE A\*-C. For some young people this will clearly be the most appropriate route, however for others alternative programmes in English and mathematics that ensure progression from their current level will need to be developed.
- 27 It should be noted that it will be more difficult for students to retake GCSE English and mathematics with the removal of modular routes.
- 28 We consider that development in these areas should be looked at more widely than under the headings English and mathematics. It would be more appropriate for these areas to be expanded to be about literacy, communication skills and numeracy.
- 29 In mathematics, it is the mathematical skills for young people relevant to their lives and area of employment that are of greatest importance to them.
- 30 Similarly in English it is their essential literacy and communication levels that need to be developed to levels that enhance their lives and career prospects.
- 31 ASCL considers that progression routes for those below a grade C in English and mathematics should be linked to their main programmes of study so that students will directly see the relevance of these vital skills for their future life. There is clear evidence that students are more motivated in studying these areas when they see the direct link to their life and employment prospects.
- 32 There is already some evidence through work with employers on the literacy and numeracy skills required across a range of jobs and it would be useful to build this experience into developing appropriate programmes and qualifications.
- 33 The same principle of relevance will apply to those students who have already obtained a grade C or better in mathematics should it be determined that all students are to continue with mathematics education beyond 16. Further study

in mathematics should be directly related to the student's main area of study. This is relatively straightforward for those studying science, technology, engineering or mathematics (STEM) but can also apply to a range of other subject areas; for example in geography and social sciences knowledge of statistics is important.

- 34 Careful consideration needs to be given to what the mathematical progression and perceived relevance by young people would be for those studying in subject areas such as languages and English. It may well be that the progression in mathematics is in more practical life skills related areas extending GCSE mathematics into areas such as mortgages and credit rates.

## **F Simplifying areas of particular concern and removing barriers to providing high-quality internships**

- 35 It is increasingly difficult to find appropriate work placements, both for work experience and work shadowing. Funding limitations have meant that a number of supporting agencies no longer exist or have been scaled-down to such an extent that they cannot cope with the numbers of students looking for placements.
- 36 Given the current economic situation it is understandable that employers have other priorities, particularly as good quality work placements require a significant commitment from the employer.
- 37 There are bureaucratic burdens in operating work placements and ASCL would welcome further discussions on how this bureaucracy can be reduced. As indicated in the consultation major areas that need addressing relate to insurance and health and safety issues. Very often young people cannot go on work placements that are highly relevant to their chosen career route because of health and safety concerns.
- 38 ASCL welcomes the proposed developments in determining the key elements of a good internship system.
- 39 I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

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