

Table of Contents

SEC PSEQ consultation response	2
Employability standard	2
Question 7	2
Question 8	2
Question 9	2
Question 10	2
Personal and social development standard	3
Question 11	3
Question 12	3
Question 13	3
Independent living standard	4
Question 14	4
Question 15	4
Question 16	4
All standards	5
Question 17	5
Employability qualifications	5
Question 18	5
Question 19	5
Question 20	6
Personalised PSEQs	6
Question 21	6
Question 22	6
Question 23	7
Question 24	7
All qualifications	7
Question 25	7
Next steps	8
Question 26	8
Question 27	8
Question 28	9
Question 29	9

SEC PSEQ consultation response

Employability standard

Question 7

Are the content areas covered in the Employability National Standard important for students to be successful in securing and maintaining entry level employment?

YES

Response – not allowed by DfE for this question.

Question 8

Is the Employability National Standard appropriate to employer needs for the entry level work force?

NO

Response – not allowed by DfE for this question.

Question 9

Are there any additional content areas that should be covered in the Employability National Standard?

YES

Response:

There are whole content areas missing and significant areas of learning omitted from existing content areas. Some Entry 1 and Entry 2 learning outcomes need to be replaced with outcomes more appropriate to learners working at these levels.

Content is arbitrarily structured. It does not appear to be based on any analysis of the barriers faced in the workplace by young people or adults with Special Educational Needs or Disabilities (SEND) This is likely to make qualifications less effective in preparing students to gain and sustain employment.

Question 10

Are there any content areas in the Employability National Standard that should be removed?

NO

Response:

There are no whole content areas that should be removed. However, there are elements which might be removed

- at E2 and E1, where some learning outcomes are included which are not priority areas of learning for learners at this level, to the exclusion of more important aspects
- where there is unnecessary overlap and repetition across content areas
- where there is an excessive emphasis on knowledge over skills
- where content areas cover an excessive amount of content.

Personal and social development standard

Question 11

Are the content areas covered in the Personal and Social development National Standard important for student personal and social development?

YES

Response - not allowed by DfE for this question.

Question 12

Are there any additional content areas that should be covered in the Personal and Social Development National Standard?

YES

Response:

There are whole content areas missing and significant areas of learning omitted from existing content areas. Taking as a starting point existing frameworks and definitions of personal and social development such as the Preparing for Adulthood Outcomes or areas cited in the personal and social development judgement area of Ofsted's Education Inspection Framework would have led to the inclusion of a wider range of content areas. There is little content corresponding to the Community Inclusion strand of the Preparing for Adulthood outcomes. This type of content forms an important part of students' study programmes, so it is unjustifiable to exclude it from the curriculum framework.

Question 13

Are there any content areas in the Personal and Social Development National Standard that should be removed?

YES

Response:

All of the proposed content areas are relevant but there is currently considerable overlap between the PSD and IL standards which suggests some content might need to be removed from one or other of the standards, and potentially the two standards being combined.

Independent living standard

Question 14

Are the content areas covered in the Independent Living National Standard important to equip students to live a successful life with agency?

YES

Response- not allowed by DfE for this question.

Question 15

Are there any additional content areas that should be covered in the Independent Living National Standards?

YES

Response:

There is content missing from the Independent Living standards. Taking as a starting point existing frameworks and definitions of independent living such as the Preparing for Adulthood Outcomes and involvement of target learners in the development process would have led to the inclusion of a wider range of content areas, including content needed to equip young people to navigate health services and other public services. This type of content is vital in addressing the many poor outcomes experienced by young disabled people.

Question 16

Are there any content areas in the Independent Living National Standard that should be removed?

NO

Response:

All of the proposed content areas are relevant but there is currently considerable overlap between the PSD and IL standards which suggests some content might need to be removed from one or other of the standards and potentially the two standards being combined.

All standards

Question 17

Are the National Standards sufficient to future-proof PSEQs?

NO

Response:

Some of the standards already feel out of date in that they do not fully reflect priority areas of learning for 21st century living. More modern content is needed such as content about healthy sleep; responsible social media use; reasonable adjustments; assistive technology and sustainability.

Employability qualifications

Question 18

Do you agree the Employability qualifications should only be available at level 1?

NO

Response:

Employability qualifications should be available at level 1 and all three Entry sub-levels. Government should not be denying access to employability qualifications to learners working at Entry level. Implementing this proposal will send a message that government does not consider anyone working below Level 1 to be capable of employment. The proposal is discriminatory.

It undermines other government policies and programmes, including supported internships and addressing the disability employment gap. It may encourage providers to have more limited aspirations for Entry level learners and discourage employers from recruiting them. Entry level qualifications in employability provide a progression ladder, recognising learners' steps towards employment and recording their achievements relevant to the workplace.

Question 19

Do you agree that the delivery of the Employability qualification should cover at least 75% of the Employability Standard, whereas the assessment should cover the whole of the Standard?

NO

Response:

It is not appropriate to require learners to be assessed on all 14 areas in the employability standard. Not all areas of the standard will be relevant or accessible to all learners. It is also inappropriate to require providers to deliver a minimum of 75% of the standard.

Personalisation of learning is essential so providers, rather than government, should determine how they prepare learners to achieve a qualification.

Question 20

Do you agree that Employability qualifications should allow the option to add content areas Travel and Transport and Physical & Mental Health?

YES

Response – not allowed by DfE for this question.

Personalised PSEQs

Question 21

Do you agree that Personalised PSEQs should be available at each level from entry level 1 to level 1?

YES

Response:

Personalised PSEQs should be available at level 1 and each of the three Entry sub-levels. However, there should be more than one size of qualification available at each level (e.g. award, certificate and diploma) and separate, distinct employability qualifications should form part of the offer.

Question 22

Are the levels of the National Standards sufficiently differentiated to avoid repetition?

NO

Response:

The degree of demand across content areas purportedly at the same level is inconsistent. It also does not match the degree of demand within other established frameworks such as the standards for Functional Skills.

Furthermore, the content at Entry levels is often very vaguely phrased. This would not help students as they are best supported when learning is broken down into smaller achievable steps. This means that assessment content should be more, not less, specific than at higher levels.

Question 23

Do you agree with our proposal that Personalised PSEQs should have a fully optional and flexible model tailored to students' needs?

YES

Response:

We agree that personalised PSEQs should be fully optional and flexible to meet learners' needs, but the model proposed will not deliver the required flexibility. It is only flexible in terms of enabling content areas to be freely combined but the blocks of content (with their mandatory learning outcomes) are too large. With only one personalised PSEQ per awarding organisation permitted per level, the proposed model does not allow learners to access a size of qualification that matches their needs or to have their progress in terms of broadening of skills recognised. It does not allow for the fact that students have different skills at different levels.

Question 24

Is further guidance needed with the National Standards to provide clarity about how the National Standards are to be applied?

YES

Response:

There is insufficient information provided to enable awarding organisations to design qualifications based on the proposed national standards. Awarding organisations are best placed to explain what further guidance is needed.

However, we would recommend that awarding organisations are advised how they can construct units from content areas and learning outcomes. They should be able to sub-divide content to create bite-sized units to allow learning to be personalised.

All qualifications

Question 25

Do you agree that the Guided Learning Hours (GLH) should range from 55-160 to meet the needs of: • adult learners? • 16-19 students?

NO

Response:

The proposed guided learning hours are not appropriate. Each awarding organisation needs to be able to offer a range of different sizes of qualification, with different amounts of content coverage, to meet learners' varying needs. It would not be possible for the entire

employability standard at level 1 (or even the 75% referred to) to be delivered in just 55 hours. There should be options to accredit units individually which would be useful for students on very small courses, for example in offender learning.

Next steps

Question 26

What support is needed in the sector to implement the proposed reforms to PSE qualifications?

Response:

The proposed reforms should not be implemented in their current form. They should be withdrawn. The standards should be re-written and expanded, with reference to existing frameworks and with the involvement of learners. The qualification proposals should be amended so that the range of qualifications on offer and the design principles underpinning them support flexible use within personalised programmes of learning.

Question 27

Do you have any concerns regarding the potential impact that the principles and proposals outlined in this consultation, including the draft National Standards, may have on students with SEND or those with a protected characteristic under the Equality Act 2010?

YES

Response:

We have serious concerns that, if implemented, the principles and proposals in this consultation will result in a poorer employability, personal and social development and independent living skills qualification offer than that which is currently available. As learners with SEND make up a significant proportion of the users of these qualifications, they will be disproportionately adversely affected.

In its mission to create a simpler system and reduce the number of qualifications, DfE has lost sight of the fact that the primary purpose of qualifications at these levels is to recognise progress and achievements important to the individual. That means that there must be a high degree of flexibility so that providers can match learners' achievements to qualifications. The proposed rigid and limited qualification structure and the large amounts of mandated content will impede providers' ability to use qualifications in this way. Critically, excluding learners working at Entry level, many of whom will be disabled or have an SEN, from accessing employability qualifications is discriminatory.

Implemented as they stand, these proposals risk

- reducing the potential of PSEQs to be personalised to meet learner need
- reducing their potential to support learner progression
- reducing their potential to motivate and re-engage learners
- reducing aspirations for employment for learners working at Entry level and discouraging employers from recruiting them
- reducing the opportunity to recognise and celebrate smaller chunks of achievement that represent huge steps for learners with SEND/other disadvantage
- imposing some irrelevant learning at E1 and E2, particularly in employability, and failing to focus on what really supports them to make progress and to achieve their aspirations
- excluding learners who cannot achieve all the mandatory content areas or learning outcomes, or for whom some content areas or learning outcomes are irrelevant, from having their achievements recognised through qualifications
- through an over-emphasis on knowledge over skills, encouraging more classroom-based and less active, practical, project-based and experiential learning and use of naturally occurring assessment, which typically benefits learners with SEND
- reducing the amount of Community Inclusion content intended to equip students to take part in the lives of their local communities

Question 28

Are there any additional impacts that you think should be considered?

YES

Response:

Having Employability qualifications only at Level 1 is likely to undermine the supported internship programme, reduce employer willingness to recruit learners with SEND, and have a negative impact on the already shockingly low employment rate of people with learning disabilities. Government should be taking this opportunity to actively promote the employability of people working below Level 1.

Question 29

Overall, are there any additional comments that need to be considered?

Response:

The proposals seem to be based on a misunderstanding of the purpose of qualifications at this level. Qualifications do not exist solely to tell employers about what skills learners have gained; in fact, the primary purpose of these qualifications is to recognise progress and achievements important to the individual.

There has been no consideration of existing frameworks, such as Preparing for Adulthood, the personal and social development content in the Ofsted Education Inspection Framework, or the Gatsby benchmarks. These would have provided a sound, evidence-based, and in some cases co-produced, starting point to have worked from. Involvement of the target learner groups in the development process would have led to the identification of relevant content currently missing from the standards.