

Natspec response to the consultation on national standards for personal, social and employability skills qualifications

Question no.	Question	Yes/No	Response
			Employability standard
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	<i>[Grey-shaded boxes indicate that the DfE consultation does not allow for comments.]</i>
8	Is the Employability National Standard appropriate to employer needs for the entry level work force?	NO	
9	Are there any additional content areas that should be covered in the Employability National Standard?	Yes	<p>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 replacing with outcomes more appropriate to learners working at these levels.</p> <p>Missing content areas include: job search, job application and interview skills; enterprise and self-employment, including less traditional forms such as online selling and monetising of hobbies; and environmental awareness and sustainability. Managing work/life balance, effective home and remote-working, and resilience at work are also themes that could be usefully included.</p> <p>Significant areas of learning are also missing from existing content areas. For example, missing from Professional Communication are verbal and non-verbal communication and listening skills, use of different communication platforms such as social media, and the links between what and how messages are communicated and personal, professional or organisational reputation. Workers' Rights should also</p>

			<p>address reasonable adjustments, employer and employee rights and responsibilities and the linkages between these, and place a greater emphasis on health and safety.</p> <p>The Entry level content areas, particularly at E1 and E2, do not always reflect priority skills/knowledge for learners working at these levels. For example, the Entry 1 Professional Communication standard could usefully include: engage in simple interactions with colleagues and customers; answer and ask straightforward questions; listen and respond to simple instructions; ask for clarification or repetition when needed; use key workplace terminology correctly.</p>
10	<p>Are there any content areas in the Employability National Standard that should be removed?</p>	NO	<p>There are no whole content areas that should be removed. However, there are elements which might be removed</p> <ul style="list-style-type: none"> • 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. <p>For example, understanding of business types and structures could be removed from E1 and E2 standards for Commercial Awareness and Money and replaced with understanding that wasting resources or time costs an employer money and how to take responsibility for handling money that isn't one's own.</p> <p>For example, in Relationship Management all but one learning outcome at Level 1 require learners to explain, recognise, identify or review rather than apply knowledge in practice or demonstrate skills. The E3/2 learning outcomes require learners to describe, recognise, identify, reflect, express, give examples and discuss. These kind of command verbs lead to worksheet completion and classroom-based rather than active or practical assessment and skills demonstration.</p>

			<p>Some of the learning outcomes would benefit from an edit as the amount of content to be mandatorily covered is excessive, e.g., in Commercial Awareness and Money level 1, one learning outcome covers: budgets, income; costs; spending; borrowing; profit; risk; savings and debt; business purpose and products; supply and demand; public and private sectors... If all of this content must be covered, the qualification is going to become unwieldy and will far exceed the proposed GLH.</p> <p>The standard would benefit from a clear definition of employability, which draws on existing research and established frameworks. This could be used to help organise the content areas into themed groupings with clear headings. The introduction to each content area should be re-drafted to provide a clear rationale for its inclusion. This approach would make it much easier to identify whether any content has been missed or unnecessarily included.</p>
			Personal and social development standard
11	Are the content areas covered in the Personal and Social development National Standard important for student personal and social development?	YES	
12	Are there any additional content areas that should be covered in the Personal and Social Development National Standard?	YES	<p>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.</p> <p>Missing content areas include: community involvement and contribution; rights and responsibilities as citizens; understanding and engagement in the political process; equality, diversity and inclusion; self-advocacy; healthy relationships; environmental awareness and personal responsibility for sustainability.</p> <p>Examples of content missing from proposed content areas include:</p> <ul style="list-style-type: none"> • Cooperation and Engagement (which reads more like Team Work) - compromise, negotiation, turn-taking and concepts of fairness

			<ul style="list-style-type: none"> • Self Management - regulating own behaviours/managing own emotional responses • Health and Wellbeing – sleep, exercise, sexual health • Accessing Information, Guidance, and Support – recognising when others need help and being able to offer it • Critical thinking and Creative Enquiry – ideas generation and collaborative approaches • Digital technology and online environments – responsible and healthy [not just safe] use of digital devices/social media. <p>There is no clear set of guiding principles underpinning the choice of content areas. The proposed selection places an emphasis on developing 'effective operatives', rather than active citizens and well-rounded individuals with the knowledge, skills and behaviours to contribute to society, interact positively with others and lead fulfilling, healthy adult lives. As a whole, the content does not seem to fully consider the 21st century world that the target learners are navigating, the particular issues they face and the skills/knowledge/understanding they need to thrive. Involving learners in the development of these standards with might have led to the inclusion of more of such content.</p> <p>Some of the content areas, particularly those where there is a near equivalent in the Employability Standards, are too closely linked to the employment context, e.g. Cooperation and Engagement does not give much consideration to the dynamics of group situations such as communal living, working as a part of a learning group, participation in team sports or being part of a friendship group. These are especially important at Entry level.</p>
13	Are there any content areas in the Personal and Social Development National Standard that should be removed?	YES	<p>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.</p> <p>Both the PSD and IL standards would benefit from clear definitions of 'personal and social development' and 'independent living' and reference to existing research and</p>

			<p>established frameworks. This approach would make it much easier to determine whether any content has been missed or unnecessarily included and to identify unnecessary overlap and repetition across PSD and IL standards and between content areas within each standard. It may also lead the DfE to decide that the proposed PSD and IL standards should be combined into a single standard.</p> <p>Agreed content areas should be organised into themed groupings with clear headings. The introduction to each content area should be re-drafted to provide a clear rationale for its inclusion within the standard.</p>
			Independent living standard
14	Are the content areas covered in the Independent Living National Standard important to equip students to live a successful life with agency?	YES	
15	Are there any additional content areas that should be covered in the Independent Living National Standards?	YES	<p>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.</p> <p>Examples of missing content include:</p> <ul style="list-style-type: none"> • more explicit coverage of self-advocacy • directing/managing own support and mastery of assistive technologies [critical for learners who will always be reliant on the support of others/technology] • responsibilities of a householder [particularly valued by care leavers] • community contribution including volunteering and the benefits of that to self and others [not just participation in social/community activities]

			<ul style="list-style-type: none"> skills to help learners manage unstructured time [something that can be very challenging after years of highly timetabled days with well-established routines when they move into a post-education world]
16	Are there any content areas in the Independent Living National Standard that should be removed?	YES	<p>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.</p> <p>Some content areas would benefit from a refocus on skills rather than knowledge. For example - Physical and Mental Health where at E3 the learning outcomes require learners to describe, recognise and describe, and consider and at E1 to express simply (x2); consider (x2) and identify. These kind of command verbs lead to worksheet completion and classroom-based rather than active or practical assessment and use of naturally occurring evidence.</p> <p>Both the PSD and IL standards would benefit from clear definitions of 'personal and social development' and 'independent living' which draw on existing research and established frameworks. This approach would make it much easier to determine whether any content has been missed or unnecessarily included and to identify unnecessary overlap and repetition across PSD and IL standards and between content areas within each standard. It may also lead the DfE to decide that the proposed PSD and IL standards should be combined into a single standard.</p> <p>Agreed content areas should be organised into themed groupings with clear headings. The introduction to each content area should be re-drafted to provide a clear rationale for its inclusion within the standard.</p>
			All standards
17	Are the National Standards sufficient to future-proof PSEQs?	NO	<p>Some of the standards already feel out of date in that they do not fully reflect priority areas of learning for 21st century living. See comments above about missing content such as healthy sleep; responsible social media use; reasonable adjustments; assistive technology and sustainability; work-life balance and home/remote working; resilience.</p>

			Employability qualifications
18	Do you agree the Employability qualifications should only be available at level 1?	NO	<p>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.</p> <p>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.</p>
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	<p>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. Providers, rather than government, should determine how they prepare learners to achieve a qualification.</p> <p>Not all of the content areas in the employability standard will be important to or for all learners, or equally relevant for all areas of employment. A requirement that assessment covers all 14 areas will create unnecessary barriers to achievement. Many learners will benefit from smaller qualifications, which allow them to select the units/content areas most appropriate to their needs, strengths and employment aspirations. The requirement for such a large amount of mandatory content (14 weighty content areas) would typically be associated with licence to practise qualifications, which a level 1 employability qualification most certainly is not.</p> <p>Providers will make their own assessments about learners' prior achievements and starting points in determining how they structure the course and cover the qualification content. Encouraging an approach where up to 25% of qualification</p>

			content need not be taught would not be beneficial in terms of setting high standards for the delivery of employability skills courses.
20	Do you agree that Employability qualifications should allow the option to add content areas Travel and Transport and Physical & Mental Health?	YES	
			Personalised PSEQs
21	Do you agree that Personalised PSEQs should be available at each level from entry level 1 to level 1?	YES	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 skills qualifications should form part of the offer.
22	Are the levels of the National Standards sufficiently differentiated to avoid repetition?	NO	<p>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. For example, the numeracy demands of some of the E1 learning outcomes exceed what is expected in Entry 1 Functional Skills maths.</p> <p>There is insufficient differentiation between E1 and E2 in many content areas. It is not appropriate to include 'with support' in Entry 1 learning outcomes, as a differentiator between E1 and E2. Learning outcomes should specify what a learner at Entry 1 can achieve independently, not least because it is impossible to determine/moderate how much support different learners will receive.</p>
23	Do you agree with our proposal that Personalised PSEQs should have a fully optional and flexible model tailored to students' needs?	YES	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

			<p>appear to allow for their spiky profiles to be recognised as there is no mention of content at different levels being available within a single qualification.</p> <p>To be able to make use of qualifications within personalised provision that meets learners' needs, a PSEQ framework (including employability skills qualifications at <i>all</i> levels) is required with</p> <ul style="list-style-type: none"> ○ three different sizes of qualification at each level per awarding organisation, with each size of qualification nested within the next size up (i.e. all the units in the smaller qualifications are also available in the larger qualifications) ○ rules of combination that not only avoid the mandatory inclusion of any content areas, but also allow for a small proportion of the content to be achieved at one level above or below the qualification ○ qualification titles that reflect the content covered by the learner, e.g. Award in Employability Skills, Certificate in Personal and Social Development. A separate title maybe needed for qualifications in which content from across the standards is combined. ○ unit certification, with flexibility for AOs to create units from sub-sets of the learning outcomes within a content area, rather than an expectation that a unit will cover all the 'mandatory learning outcomes' (e.g. Healthy Eating' rather than the whole of 'Physical and Mental Health) ○ transcripts to accompany or form part of the certificate to indicate content areas covered.
24	Is further guidance needed with the National Standards to provide clarity about how the National Standards are to be applied?	YES	<p>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.</p> <p>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 teaching and learning to be</p>

			<p>focused on aspects relevant to individual learners, e.g. following instructions, time management, interacting with customers, healthy eating, all of which appear in the standards but as part of much larger content areas, where some aspects may not be achievable or relevant for an individual learner.</p> <p>In any guidance on assessment, AOs should be advised that a portfolio of evidence is the expected assessment method. This will allow learners to put forward evidence in a range of different formats, including naturally occurring evidence of the required skills demonstrated on work placement or through the completion of project-based learning, for example, a witness statement from a work placement employer that a learner has demonstrated consistent punctuality or a video of a learner completing a transaction when out on a shopping trip.</p>
			All qualifications
25	<p>Do you agree that the Guided Learning Hours (GLH) should range from 55-160 to meet the needs of:</p> <ul style="list-style-type: none"> • adult learners? • 16-19 students? 	NO	<p>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.</p> <p>Each AO needs to be able to offer three different sizes of qualification at each level, with each size of qualification nested within the next size up. It is impractical to expect providers to engage with multiple awarding organisations in order to access the range of sizes required to meet the needs of different cohorts or individual learners. The model of Award, Certificate and Extended Certificate or Diploma (with total qualification times set within the ranges permitted by Ofqual) at each of Entry 1, 2, 3 and level 1, that is currently adopted by most awarding organisations, is largely working well and should not be replaced.</p> <p>A qualification with a fixed amount of content, such as the proposed level 1 employability qualification, will have a fixed amount of total qualification time (TQT) and a corresponding GLH reflecting how much of the time will be spent on taught</p>

		<p>time, as opposed to self-study and assessment. GLH for a qualification is fixed and does not vary by cohort. Setting a range of GLH for the level 1 employability qualification is therefore not logical. It is also unreasonable to expect that a qualification covering the whole of the Level 1 employability could be delivered in anything near to 55 hours. Time-pressured adults need smaller qualifications, through which they can focus on priority skill development, not less time to complete large ones. Smaller qualifications should be available for both adults and young people, who often combine employability qualifications with extended work placements, English and maths and non-accredited personal development and enrichment activity. Smaller qualifications are also used effectively in short interventions that support re-engagement with learning and to give learners an early experience of success on a course, which is particularly motivating for those who have not previously achieved any qualifications or who are lacking in confidence or self-esteem.</p>
		<p>Next steps</p>
<p>26</p>	<p>What support is needed in the sector to implement the proposed reforms to PSE qualifications?</p>	<p>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.</p> <p>A thoroughly revised set of standards could provide a supporting framework to help providers build a meaningful, aspirational and well-structured curriculum for learners regardless of whether achievements arising from it are accredited or not. Awarding organisations could be required to develop qualifications which are <i>consistent</i> with these standards, cross-referencing units to learning outcomes, but they should be free to select and organise content, and include additional content, as relevant to provider demand/learner need. The concept of mandatory learning outcomes should be dropped.</p>

			If the revised standards are offered as a supporting framework, providers would benefit from guidance on how to use the standards to build a curriculum and how the learning outcomes can underpin personalised programmes.
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	<p>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.</p> <p>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 large amounts of mandated content will impede their 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.</p> <p>Implemented as they stand, these proposals risk</p> <ul style="list-style-type: none"> • 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

			<ul style="list-style-type: none"> • 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.
28	Are there any additional impacts that you think should be considered?	YES	<p>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.</p>
29	Overall, are there any additional comments that need to be considered?		<p>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.</p> <p>The way in which some content areas in the employability standard are drafted, e.g. Communication, makes them more relevant to an office environment than to a practical context, such as construction or a land-based workplace.</p> <p>There is a lack of logic about the way in which content areas have been assigned to each of the Personal and Social Development and Independent Living standards. For example, being able to travel independently is a core independent living skill, while having healthy relationships is a part of personal and social development, but the</p>

			<p>former comes under PSD and the latter under IL. There is also quite a lot of repetition across content areas in the two standards. See, for example, the content areas</p> <ul style="list-style-type: none">• Choices, Judgement and Problem-solving where the same title appears in each standard but the content areas include different learning outcomes• Health and Wellbeing (PSD) and Physical and Mental Health (IL), which have considerable overlap. <p>It is not clear why two separate standards are needed. If content areas across the two standards were thematically grouped under clear headings, they could probably be brought together into a single standard.</p> <p>These proposals do not make it clear whether the two qualification titles, 'Employability' and 'Personalised Personal, Social and Employability Skills' (albeit at different levels) will be the only publicly funded qualifications in subject/sector areas 14.1 and 14.2, beyond English and maths, essential digital skills and ESOL. Depending on the government's intentions, we would like to see learning and study skills and parenting skills either incorporated into the proposed standards or qualifications in these areas continuing alongside the proposed PSEQs.</p> <p>The Independent Living standard, and to some extent the Personal and Social Development standard, demonstrates a far greater understanding of what is relevant to Entry level learners than the Employability standard, where too many of the Entry level learning outcomes are simply 'watered down' versions of those at Level 1. When revising the standards, consideration should be paid to what constitutes valuable knowledge, skills and understanding in each content area at each individual level.</p> <p>Rather than making an exception for just Travel and Transport and Physical and Mental Health, it might be more appropriate to allow a small number of content areas from either PSD or Independent Living (without prescribing which) to be included where a provider determines these are important in increasing the chances of employment for the learner. This would support personalisation.</p>
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