



Isabel Nisbet
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19th November 2007

Dear Isabel

Efficiency of the qualifications system scoping exercise

Thank you for inviting comment on the Europe Economics Report 'Scoping Exercise for a study of the efficiency of the qualification system'. It will be difficult to comment in detail on a closed set 80 plus page document, but I hope you find the following broad comments helpful.

As representatives of the vocational awarding bodies we found the dominance of data relating to general qualifications and to systems and structures primarily supporting general qualifications worrying. We recognise at least in part this reflects the less extensive data available on vocational qualifications, and their greater diversity. We would however consider any conclusions on the report in respect of vocational qualifications to be very tentative at best.

The description of the 'hierarchy' of organisations in the qualifications system in figure 4.1 includes government, regulators, awarding bodies and schools and colleges. We find the omission of SSCs from this picture a major concern and feel that this shows a lack of insight into the environment in which vocational awarding bodies operate. The mention of SSCs in some later text does not balance out the gap in this fundamental representation of the system.

It is not until annexe 4 on page 82, when talking about unrecognised awarding bodies, that we learn that it is proposed that the efficiency study would be aimed at 16-19 qualifications only. This is not said anywhere in the main body of the report unless we have missed the reference. It does not seem possible to develop an understanding of the finances and operation of a vocational awarding body solely by analysis of the operation of qualifications at 16-19. Similarly much of the activity of vocational awarding bodies is directed through employers rather than schools and colleges, but it would seem that qualifications activity with employers would be excluded.

We would suggest that this would result in such a partial and potentially flawed view of vocational qualification activity that it would be safer to exclude vocational qualifications from the scope of the study entirely.

I would be happy to discuss any of these observations with you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Ellis', with a small flourish at the end.

Paul Ellis
Chief Executive

Cc David Saunders, QCA