



The Rt Hon Damian Hinds MP  
Secretary of State for Education  
Department for Education  
Sanctuary Buildings  
20 Great Smith Street  
London, SW1P 3BT

10 June 2019

Dear Secretary of State

**Review of Post-16 qualifications at Level 3 and below**

I'm writing to enclose the Federation's formal response to the Department's post-16 review of qualifications at Level 3 and below.

The key finding from discussions with our awarding body members is one of the need for continued learner choice and flexibility in the system.

The evidence both we collectively and some of our members will be submitting individually, demonstrates the value of many Level 3 qualifications for improving skills, productivity and social mobility. These qualifications also help adults to re-train for a new career and they support those with special educational and disability needs.

I'm delighted that the Minister for Skills and Apprenticeships, Anne Milton MP, has agreed to address the Federation's National Strategy Forum on 4<sup>th</sup> July, when the review will be discussed further.

We would like to continue to work closely with you, Ministers and Officials in the next stage of this important consultation exercise. Our formal submission during this first stage of the process highlights the importance of ensuring greater transparency and evidence-based policy-making in decisions about which qualifications should be eligible for public support.

We believe the government must use taxpayers' money to fund what works in the arena of vocational qualifications. It would be unhelpful, in our view, to propose an approach to supporting below Level 3 qualifications based purely on an ideological approach to technical education reform; or to engage in artificially manipulating the marketplace.

The publication of the Augar Review is a further reminder of how recent qualifications' and funding reforms – including the collapse in learners participating below Level 3 in FE – has detrimentally hit some of the most vulnerable people in our society.



Of course, one way to avoid this kind of unintended consequence, would be to allow educators, employers, learners and experts (e.g. economists); to feed into an independent mechanism that supports you, as Secretary of State, to make informed decisions about such a vital area of public-policy.

We believe the Migration Advisory Committee (MAC), that advises the Home Secretary, is a good example of what we have in mind. We would like consideration given to this kind of model being adopted and further consulted on in the second stage of the review.

I look forward to receiving your views on these matters.

Yours sincerely,

A handwritten signature in black ink that reads "Tom Bewick".

Tom Bewick  
**Chief Executive**

Cc:

The Rt Hon Anne Milton MP, Minister of State for Apprenticeships and Skills, Department for Education

Jon Yates, Special Adviser to the Secretary of State for Education

Eileen Milner, Chief Executive, ESFA

Jennifer Coupland, Director of Professional & Technical Education, ESFA

Sir Gerry Berragan, Chief Executive, Institute for Apprenticeships and Technical Education

Sally Collier, Chief Regulator, Ofqual

Dr Janet Brown, Chief Executive, Scottish Qualifications Authority

Philip Blaker, Chief Executive, Qualifications Wales

Justin Edwards, Chief Executive, Council for Curriculum, Examinations and Assessment (CCEA)

Federation of Awarding Bodies Board of Directors



## **Federation of Awarding Bodies – key points in the response to the Department for Education consultation, Review of Post-16 qualifications at level 3 and below, June 2019**

### **Top 10 points:**

1. Whatever principles are to be applied to qualifications to determine future eligibility for funding, the department may want to consider whether an element of independence in the decision making process would be beneficial in demonstrating the fairness of decisions e.g. through establishing some form of commission or independent reference panel to make recommendations to the department.
2. There needs to be flexibility in principles and quality criteria to ensure we can continue to design qualifications that meet the needs of a diverse range of learners. Constraining design and innovation through a prescriptive and rigid set of requirements is not an effective way forward.
3. It is essential to recognise that T levels will not be suitable for all post 16 learners who do not wish to take A levels. A range of options need to be available to meet a wide range of learner needs and ensure there are real opportunities for social mobility.
4. Learners may want to combine different types of qualifications e.g. A levels and Applied Generals or technical qualifications. A route that allow them to combine qualification types should be available.
5. Resetting the qualifications landscape at post-16 will not, of itself, bring about the radical improvements in skills supply that the government is seeking. A systematic approach to reviewing the learner's learning journey from school to post-16 and adult learning through the prism of technical/vocational education is necessary, with effective careers advice, support and guidance running alongside.
6. Social Mobility is an important consideration in any plans to withdraw qualifications from funding and narrow the options available to learners. It is vital the department considers the impact of changes on those learners who most need an education system to support them and provide a flexible range of options to engage, motivate and upskill them in a way that supports progression to further learning or directly into work
7. A drive for simplification of the qualifications system risks that we may end up with a system that can be explained in a diagram on one side of A4 paper but



which does not, in reality, meet the needs of a diverse range of stakeholders, employers and learners who have a complex range of needs.

- 8. Entry and level 1 qualifications provide an appropriate starting point on the ladder of opportunity for many young people and adults. Qualifications at Entry and Level 1 meet the genuine needs of a diverse group of learners including school refusers and return to learn adults.
- 9. Standalone qualifications in personal, social and employability skills serve a range of valuable purposes, including improving self-esteem and supporting adult returners who may need a broad-based introduction to an employment sector. There is a link between formal learning leading to a qualification and increased wellbeing as measured by quality of life scores.
- 10. Providing an exception process and an appeal process for low and no enrolment qualifications will help to ensure important qualifications are not taken out of funding e.g. those serving niche sectors of the economy or specific groups of learners.

<b>Area of consultation</b>	<b>Key points:</b>
Principles for funding - : purpose, necessity, progression and quality.	<p>Whatever principles are to be applied, the department may find it useful to consider whether an element of independence in the decision-making process would be beneficial in demonstrating the fairness of decisions e.g. through establishing some form of commission or independent reference panel to make recommendations to the department.</p> <p>It will be essential that the detailed requirements relating to these principles are clearly defined and transparent to ensure AOs understand the criteria their qualifications will be judged against for the purposes of funding.</p> <p>The best way to implement any additional requirements would be through an update to the General Conditions and not through the development of an additional and separate layer of requirements.</p> <p>The criteria specified in relation to quality raise a number of concerns for AOs. There needs to be flexibility to ensure AOs can continue to design qualifications that meet the</p>



<b>Area of consultation</b>	<b>Key points:</b>
	<p>needs of a diverse range of learners. Constraining design and innovation through a prescriptive and rigid set of requirements is not an effective way forward.</p> <p>Ofqual’s focus on overall validity of a qualification is a more effective way forward than a rigid set of design characteristics for all qualifications.</p>
Standalone qualifications in personal, social and employability skills	<p>The Federation strongly believes standalone qualifications in personal, social and employability skills are vital and should continue to be available to a wide range of learners.</p> <p>These qualifications serve a range of valuable purposes, including improving self-esteem, support adult returners who may need a broad-based introduction to an employment sector and contain essential life skills that are often not included within specific sector qualifications.</p> <p>The fact that there may be high numbers of these qualifications should not automatically call into question the quality of the qualifications. If anything, it demonstrates the market need for a range of qualifications that are designed to respond to the needs of a diverse group of learners.</p> <p>If the department’s intent is to establish principles that will be applied to qualifications to decide their suitability for future funding, it is not clear why these principles would not be applied to this category of qualifications.</p> <p>It is also worth noting the Department’s own research on <a href="#">the wider (non-market) benefits of post 18 Education for learners and society</a> which concludes that Education can improve wellbeing and quality of life – evidence suggests</p>



<b>Area of consultation</b>	<b>Key points:</b>
	a causal link between informal learning and formal learning <b><i>leading to a qualification</i></b> and increased wellbeing as measured by quality of life scores. <b>Formal learning not resulting in a qualification, on the other hand, does not appear to have the same effect.</b>
Adults	Adults in particular will require access to a range of qualifications which provide flexibility to respond to a wide range of needs e.g. short courses or on-line courses, modularised provision, distance learning, part time study, day release, evening courses, intensive study blocks etc.
Overlap	It is essential to recognise that T levels will not be suitable for all post 16 learners who do not wish to take A levels. A range of options need to be available to meet a wide range of learner needs and ensure there are real opportunities for social mobility.
Progression to level 3	<p>Post-16 qualification reform could best support more people to achieve at level 3 by ensuring there is a wide range of funded qualifications available to meet the diverse needs of learners. A narrow offer at level 3 will not provide the range of options needed to support different types of learners.</p> <p>There needs to be provision available that leads to qualifications other than T levels and A levels and recognition of the fact that one size will not fit all types of learners.</p> <p>It may be useful to consider whether recent reforms at key stage 4 have impacted on the likelihood that learners will progress to level 3 in technical and vocational areas. With no, or limited exposure to technical learning up to 16, it is less likely learners will opt to move into a technical subject at level 3.</p>



Area of consultation	Key points:
	<p>Effective information, advice and guidance is important to ensure learners are aware of the full range of options, including technical education.</p> <p>Learners may want to combine different types of qualifications e.g. A levels and Applied Generals or technical qualifications. The introduction to a broad vocational/occupational area through an Applied General/Tech Level can complement A level study.</p> <p>Not everyone will want or need to progress to level 3. For some learners access to a job is the most important factor and, in some sectors, this requires level 2 skills. Where employers demand level 3 skills, it will be more likely learners progress to this level on a more frequent basis.</p>
Level 1 and below	<p>Entry and level 1 qualifications provide an appropriate starting point on the ladder of opportunity for many young people and adults. Qualifications at Entry and Level 1 meet the genuine needs of a diverse group of learners including school refusers and return to learn adults.</p>
No enrolment qualifications	<p>There may be sound reasons for maintaining a qualification in funding.</p> <p>This issue could be addressed through a simple administration process.</p> <p>Any process to remove qualifications from funding must include:</p> <p><b>An exceptions process</b> to provide an opportunity for AOs and/or providers and employers to make a case for where no enrolment qualifications should be considered for continued funding.</p> <p><b>An appeals process</b> so AOs have the opportunity to appeal a decision to remove a qualification from funding.</p>
Low enrolment qualifications	<p>There are a number of reasons why a low enrolment qualification needs to remain in funding e.g. it may serve an important niche sector in England or it may have been</p>



<b>Area of consultation</b>	<b>Key points:</b>
	<p>designed to meet the needs of a specific groups of learners with protected characteristics.</p> <p>Any process for considering which qualifications to remove from funding should include:</p> <ul style="list-style-type: none"><li>• <b>an analysis of the overall size of the sector</b> (to ensure qualifications in niche areas are not removed from funding);</li><li>• <b>an exceptions process</b> to provide an opportunity for AOs and/or providers and employers to make a case for where a low enrolment qualifications should be considered for continued funding.</li><li>• <b>an appeals process</b> so AOs have the opportunity to appeal a decision to remove a low enrolment qualification from funding.</li></ul>