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

### Overview of the Federation of Awarding Bodies

The Federation of Awarding Bodies is the trade association for vocational and technical awarding organisations (AOs) with 116 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies.

Our members operate across a wide range of vocational/technical sectors and provide high quality qualifications to support learners to progress into, and within, their chosen sector. The majority of our members offer qualifications at level 3 and below to a variety of learners of all ages. They work closely with employers to identify needs and respond to these through the provision of high quality, valid qualifications.

Full members of the Federation are regulated by at least one of the UK regulators and the majority are regulated by Ofqual, the regulator for qualifications in England. Some of the qualifications awarded by our members are paid for directly by employers or learners and some are funded by the government. The Federation therefore has an interest in this consultation and we welcome the opportunity to respond. We also welcome the two-phased approach to the consultation which seeks view on issues that require careful consideration.

We welcome the 12-week consultation timeframe for responding to this important consultation. We also welcome the provision of a joint FAB/JCQ/DfE workshop which took place on 17 May 2019 and the additional DfE workshops provided for all stakeholders. These activities provided awarding organisations (AOs) with an opportunity to feed into the department's consideration of the future funding of qualifications at level 3 and below.

The 12-week consultation timescale also allowed the Federation time to consult widely with our members. We have issued a survey to members to gather feedback on a number of the proposals in the consultation. We have also held a focus group and conducted telephone interviews with a sample of members to inform this response. The draft response has been made available to all members for further comment and refinement via our weekly QuasMatter publication and through a webinar on 31 May.

This evidence submission is provided on behalf of the Federation's membership following consultation with them and with the Federation's Board of Directors. **However, AOs are a diverse community**



and our members may wish to make their own individual submissions containing their own perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

## Consultation questions

- 1. How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer? Please give reasons for your answer, including any examples of how this may be achieved.**

The Federation understands the government has the right to decide what it will and will not fund from the public purse. With ever increasing demands it is important to seek assurance that resources are being used to best effect. We also understand that the planned introduction of new technical qualifications at level 3 (T levels) provides a suitable point at which to review the qualification landscape within which they will operate.

The consultation outlines high level principles that will be used to decide which qualifications at level 3 and below will be funded in the future: purpose, necessity, progression and quality. At a very high level these principles seem reasonable. However, in seeking to 'extend this clarity of purpose to all qualifications at level 3 and below' it is essential 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.

There is a risk that the articulation of the detailed requirements to achieve these principles could result in unintended consequences that impact on the fitness for purpose of funded qualifications and their ability to meet the diverse range of needs in the learner population. To avoid these consequences there will be a need to ensure there is some flexibility in how the principles are applied. This will be essential if we are to continue to have qualifications that truly meet the needs of a wide range stakeholders, support social mobility and contribute to addressing the skills gaps in the country.

The principles, as outlined, would benefit from greater clarification before they are applied to any qualifications.

Ofqual's General Conditions of Recognition currently require a qualification to have an objective (Condition E1). The objective must "be such as to lead to a benefit for Learners who have reached a specified level of attainment". Condition E1.3 requires that qualifications have



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support and AOs “may only make available the qualification where it has evidence of sufficient support from Users of qualifications”. These requirements apply to every regulated qualification. It is not clear what the department would expect AOs to evidence, over and above what is already demanded by these regulatory requirements. This requires clarification.

The Federation believes it would be beneficial for the department to work closely with Ofqual to determine whether there are any additional areas that are not currently covered by the regulations. If there are, we believe the best way to implement these would be through an update to the General Conditions and not through the development of an additional and separate layer of requirements that is developed and administered by the department. As a review of the Conditions (across the regulators in England, Northern Ireland and Wales) is currently underway it may well be a suitable time for this issue to be considered. We have experienced, through the current performance table process, the very real potential for difficulties to arise as a result of the department layering additional requirements onto qualifications.

However, if the department ultimately decides to develop its own set of requirements which sit alongside Ofqual’s regulations, it will be important that, where these requirements use different language/terminology, there is a clear understanding of what the terms mean and how they are intended to differ (or not). For example, it is not clear whether the purpose of a qualification is intended to be different to the qualification objective, as defined by the regulator. Also, the consultation document currently seems to merge purpose and progression. The primary purpose of a qualification is to formally recognise the achievement of a defined set of knowledge, skills and/or understanding. Achievement of the qualification may support progression opportunities to further study or employment, for example. Similarly, purpose and necessity seem to have been merged. There are also specific concerns relating to the principle of quality which are detailed in our response to Q5, below.

The need for clarity in principles related to funding decisions has been illustrated recently in relation to apprenticeship standards and the review of funding bands. This process has been seen by some stakeholders as lacking transparency in terms of how evidence is collected and considered as the basis for final funding allocations. The Federation would welcome efforts by the department to ensure any funding approval process applied across qualifications at level 3 and below has transparency and clarity. We also feel it is essential that it includes a route to appeal for AOs who believe there has been an error in the evidence used as the basis for a specific funding decision.



It will also be important to be clear about how the process for determining which qualifications will be eligible for funding will operate in relation to the process for determining what qualifications will be included in the school performance tables. It is not clear if these will be separate processes in the future.

The department may also find it useful to consider whether an element of independence in the funding decision making process would be beneficial in demonstrating the fairness of decisions. The Federation is consulting with members on a proposal to include more independence in the process of deciding which qualifications should be eligible for public support in future. At the core of this is the idea of establishing some form of commission or independent reference panel to make recommendations to the department. Other government departments already take account of this kind of evidence-based decision-making by consulting with experts before complex funding decisions are made. This includes the Migration Advisory Committee (MAC) which advises the Home Secretary on how many non-EU immigration visas to issue each year; and the National Institute for Health and Care Excellence (NICE), which advises the Health Secretary about which drugs and treatments the taxpayer should fund on the NHS.

- 2. Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are other changes, we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.**

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. It is important that standalone qualifications are funded because they:

- Improve personal and social skills and self-esteem in preparation for the world of employment, e.g. setting goals, healthy living, budgeting, preparing for work.
- Build the foundations of literacy and numeracy knowledge and skills and broader life and employability skills which enable learners to progress to higher level qualifications.
- Contain essential life skills that are often not included within specific sector qualifications. They recognise the softer skills required for employment and life.
- Offer learners who are at Entry level an opportunity to begin to develop skills that enable them to progress onto different types of learning programmes or into supported employment.



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- Provide a structure which is beneficial to the teaching of these skills and is seen as adding value by teachers, trainers and tutors.
- Provide an effective way for providers to measure the progress made by learners and demonstrates the effectiveness of the teaching and learning process.
- Are often used by providers as the central qualification in a wider programme designed to re-engage learners, show them that they can achieve and motivate them to progress to further learning. The importance of re-engaging and motivating learners should not be underestimated and it is welcome that the department recognises the value of such motivational impact in paragraph 39 of the consultation document.
- Are used as a valuable part of Job Centre Plus (JCP) programmes. They offer a valuable route to developing skills that employers want and provide recognition of the learner's achievement through a national qualification.
- Are used for preparation for independent living - life skills e.g. Preparation for Life programmes designed for young, vulnerable mothers, to develop their social skills, parenting skills and their confidence, improving their lives and the lives of their children.
- Are valued by learners and also their parents who use the achievement of a qualification as an indicator of the value of a course of study. Discussions with FE Colleges at the DfE event on 16 May strongly indicated that parents are often not convinced of the value of course content that does not lead to a qualification. Qualifications are a strong currency, recognised and valued by a wide range of stakeholders.
- Are used to support adult returners who usually need a broad-based introduction to an employment sector coupled with opportunities to develop personal and employability skills in a supportive, encouraging environment.
- Are particularly important to specific groups of learners e.g. SEND group of learners and those who have been previously disadvantaged throughout their education.
- The work of [De Coulon and others \(2017\)](#) shows that below level 2 courses in Preparation for Life and Work are associated with better labour market outcomes than other smaller, less popular subjects such Agriculture and Business and languages.

Please see case study 1 and 2 in appendix 1 for examples of the impact these qualifications can have on the lives of learners and how they can support them into employment.



The rationale for singling out qualifications in personal, social and employability skills for particular scrutiny is not presented in the consultation. 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. 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.

It is also worth noting the Department's own research on [the wider \(non-market\) benefits of post 18 Education for learners and society](#) which concludes that Education can improve wellbeing and quality of life – evidence suggests a causal link between informal learning and formal learning **leading to a qualification** and increased wellbeing as measured by quality of life scores. **Formal learning not resulting in a qualification, on the other hand, does not appear to have the same effect.**

### 3. What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?

Measuring successful outcomes firstly requires a clear definition of what a successful outcome is. In doing this it is essential that the department recognises a full range of outcomes achieved by a wide range of learners.

Capturing destination data is a challenging task when it relies on learners providing data on their progression once they have moved on from their provider. Requests for survey responses and data requests are likely to achieve low return rates, making the data sample an unrepresentative indicator of the overall learner population. This would need to be understood if data needs to be sought directly from learners.

Some AOs, including those awarding Applied General Qualifications, may have gathered data on outcomes related to their qualifications from a sample of learners, but this would need to be determined on an AO by AO basis.

Data gathered through national data systems is useful but such data needs to be used in a way that ensures any conclusions drawn are accurate. The department may find it useful to consider the data analysis approach used by Buscha and Urwin in [Estimating the labour market returns to qualifications gained in English FE using the ILR \(April 2013\)](#) which



estimates separately the (i) earnings, (ii) employment and (iii) benefit premiums secured by those who achieve their highest learning aim whilst studying at an English Further Education Institution (FEI), **relative to those who have the same highest learning aim, but do not achieve**. The study used a dataset containing FE learner information, benefit and PAYE employment histories constructed from the Individualised learner Record (ILR), together with the Work and Pensions Longitudinal Study (WPLS).

The department may also find it useful to consider how the work of Professor Urwin has moved thinking on beyond the assertions of Professor Wolf in 2011 and provides evidence that earlier research, based on more limited data, had underestimated the returns from FE learning at level 2 and below. Professor Wolf, has herself, [welcomed this work in 2015](#).

The Quality Assurance Agency (QAA) has data on Access to HE learners which may be useful to consider. This is an important area of post-16 provision.

#### **4. How could we better use data about student outcomes to monitor and assess the success of future qualifications?**

The Federation believes the use of longitudinal data may be more effective in monitoring the success of qualifications. Many learners do not progress in a linear pattern and may only utilise the benefits of achieving a particular qualification after a number of years.

#### **5. Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.**

The Federation is fully supportive of the need to provide qualifications that are of good quality. We believe our members strive for quality in every qualification they develop, regardless of whether it is funded.

Ofqual, the qualifications regulator in England, has validity at the heart of its regulatory approach. The Federation believes this is an appropriate focus because it allows flexibility for a qualification to be designed in the way that is fit for its specific purpose. Our members operate under Ofqual regulation in England and comply with the regulatory requirement for validity in all regulated qualifications. AOs face potential regulatory action, including financial penalties, if they breach regulations and fail to ensure the validity of a qualification.

The regulatory approach, with validity at its core, does not attempt to lay down rigid design rules to apply to all qualifications. The regulator recognises the need for different types of qualifications that meet the needs of different types of learners, in different circumstances and



contexts. It also recognises the difficulties that can be encountered by attempting to apply one set of criteria to all qualifications and the challenges this can present to the overall validity of qualifications.

The validity challenge presented by a requirement to design qualifications to a prescriptive set of indicators is an issue that has been illustrated by the application of the performance tables characteristics in recent years. It is important that the same issues are not repeated in requirements that are specified as conditions for funding. For example, the application of minimum external assessment requirements has been particularly challenging in some sectors where this is not the most appropriate way to assess the construct that the qualification is aiming to assess.

Ofqual is currently undertaking a programme of work on Strengthening Qualifications. It may be worthwhile to allow Ofqual the time to complete this work before making any decision that seek to add additional requirements onto qualifications, especially where these may have the potential to present a risk to overall qualification validity. Where Ofqual identifies additional requirements that are needed to strengthen qualifications these should be reflected in regulations. This would avoid the need for an additional set of requirements that sit outside of regulation with the potential to duplicate or conflict with regulatory requirements.

Although the department clearly believes the characteristics for the performance tables qualifications have been effective in delivering quality, the Federation is not aware of any research evidence which supports this view. It would be beneficial to have sound evidence prior to a decision being taken to apply similar requirements to a wider range of qualifications.

The Federation is fully supportive of the need for quality in qualifications. However, it is essential that the quality indicators adequately reflect the diverse range of end-user needs, including employers, learners and education providers and do not skew the system in favour of one stakeholder category while disadvantaging others. The principles, as currently defined, present such a threat, e.g. tighter controls over size might be acceptable for 16-18 full-time cohorts, but not for post-19 where the size and shape of qualifications should be allowed to flex according to the particular up-skilling/re-skilling needs as well as recognising the importance of recognition of prior learning for such cohorts. One size cannot fit all types of qualifications that are designed for varying purposes and vocational/technical sectors. There needs to be flexibility in the indicators, depending on the purpose of the qualification and the intended target audience.

Specific concerns related to the proposed quality criteria include:



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## Minimum size

- size is not an indicator of quality.
- The size of a qualification is important but the requirement should be for it to be of the **appropriate size** to meet its primary purpose, not a pre-determined minimum size.
- Requiring all funded qualifications to be of the same minimum size does not recognise that qualifications of different sizes are needed to respond effectively to the range of learner needs in the market. Short courses are currently available to learners which are fit for purpose and offer valuable learning opportunities which support progression into and within work.
- As well as a GLH value, AOs are also required to assign an overall value for Total Qualification Time (TQT) to every regulated qualification. Some qualifications will have a low GLH value but a much higher TQT value because they have been designed to be achieved via distance learning, on-line learning or using a blended learning approach. These methods of delivery and learning may be more accessible and better suited to learners who may be combining learning with a job and/or other responsibilities. The department may wish to consider whether the future funding approach should fund qualifications with low GLH but high overall TQT, particularly in relation to Advanced Learner Loans.
- A [recent research by the Education Policy Institute](#) has found that students are generally receiving fewer learning hours than in previous years and recommends that the government should assess the impact of 16-19 funding changes on curriculum breadth and ensure that young people have a good choice of high quality post-16 academic and vocational qualifications.

## Appropriate assessment

- This is crucial to the overall validity of a qualification.
- Requiring all qualifications to have a specific minimum percentage of external assessment presents challenges in relation to the overall validity of some qualifications. Setting minimum requirements for assessment denies the opportunity to design and develop robust fit for purpose assessment strategies in line with the intended outcomes of the qualification.
- Many competency based qualifications are continually assessed throughout the course, they do not necessarily lend themselves to the extensive external requirement.
- There are qualifications where the assessment is designed to specially meet professional body requirements as stated in standards and core curricula which may not meet the minimum external assessment thresholds e.g. VTCT Level 3 Diploma in Sports Massage Therapy and VTCT (ITEC) Level 2 Diploma in Complementary Therapies.
- External assessment presents a barrier for some learners. Having access to a market which includes qualifications where internal assessment is used provides a more suitable and accessible approach.



## Grading

- This is not a quality indicator; it is a design feature of particular qualifications.
- Not all types of qualifications will lend themselves to grading.
- In skilled areas employers do not always require grading as an output of the qualification, they simply need to know if a learner can demonstrate the skill or not.
- The use of grading in vocational and technical qualifications is an area that Ofqual has recently begun to consider in [Grading Vocational and Technical Qualifications \(November 2018\)](#). It would be useful for Ofqual to continue this research to explore how vocational and technical qualifications can most effectively be graded before the department makes a final decision on whether to introduce this as a requirement for all funded qualifications.

## Employer involvement

- the current performance tables requirements have evidenced how difficult it is to secure consistent employer involvement beyond the consultation phase of a qualification's development.
- It is not appropriate to have blanket requirement regarding employer involvement in delivery/assessment. Defining employer involvement as 'in delivery and/or assessment' is too rigid and not achievable. While employer and other stakeholder involvement should remain an indicator, the nature and extent of this should not be specified.

## Progression

- securing evidence of learner progression can be extremely challenging. It either requires central tracking of learners via national insurance or unique learner numbers or it is dependent on learners providing progression data to providers or AOs.

## Proven track record

- This is not a guarantee of quality or that the qualification is successful in terms of progression outcomes.
- The specified requirements seem arbitrary (100 achievement by 16-19 year olds in at least 3 providers in one of the first two years following approval).
- As this requirement has been in place in relation to KS5 performance tables, it would be useful to see any evidence the department has gathered on how this directly correlates with the quality of the qualification.

Access to HE learners would not be catered for should these indicators be applied across the piece. There are particular issues presented by the requirements for content, employer involvement, assessment and grading in this context. This is an important area of provision for learners who wish to progress the higher education, post 19. A number of the Federation's members validate Access to HE qualifications and we would be happy to support the department in arranging a focus group on this area of provision so it can consider the impact of any future plans on this specific area.



The Federation would also point to the recent report on [The Review of Post-18 Education and Funding](#) which highlights the underfunding of the FE sector over many years and the disparity between it and the funding of the HE sector. A review that considers only the qualifications on offer is unlikely to have a marked impact on how effective the sector can be in supporting the government to deliver future economic and workforce needs. The 'steep, steady decline in funding' which has been 'widespread and protracted' will need to be addressed. We question whether trying to prescribe the detailed design of qualification will be an effective solution to the severe underfunding in the sector, the consequence of which has been "decades of neglect and a loss of status and prestige amongst learners, employers and the public at large."

**6. Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.**

Please see the response to Q5 above. The Federation has concerns about a number of the quality features presented, especially grading, assessment and size.

We are concerned these criteria could be overly prescriptive and could present a validity challenge for some qualifications. We do not believe that requiring specific percentages of external assessment, for example, is appropriate. The important factor should be that an appropriate assessment methodology has been applied to effectively test the relevant construct being assessed.

Overall, the Federation believes the current focus of the regulator on overall validity of a qualification is the most appropriate focus. Trying to establish a list of features which are applied to all qualifications will be problematic, unless there is significant flexibility in how the requirements are applied.

**7. Are there particular quality principles that we should consider for adults? Please give reasons for your answer.**

Please see the response to Q5 above which outlines our concerns about the quality features presented.

As with other learners, adults will require access to a range of qualifications which provide flexibility to respond to a wide range of needs. For some this may be best delivered in short courses or on-line courses, modularised provision, distance learning, part time study, day release, evening courses, intensive study blocks etc. Adults may also have significant



experience from the workplace so it may be appropriate for systems that recognise prior learning to be available to them so they can be recognised for the skills/knowledge they already have and focus on filling any gaps that they have in these areas.

Any criteria prescribed for qualifications will need to be sufficiently flexible to allow AOs to develop qualifications for adults that meet their needs. This need is highly unlikely to be a 2-year full time programme of study. Constraining design and innovation through a prescriptive and rigid set of requirements is not an effective way forward.

Overall, the Federation believes the current focus of the regulator on overall validity of a qualification is the most appropriate focus. Trying to establish a list of features which are applied to all qualifications, will be problematic.

- 8. At level 3, what purposes should qualifications other than T Levels or A Levels serve:**
- a) for 16 to 19 year olds? Please give reasons for your answer.**
  - b) for adults? Please give reasons for your answer.**

The Federation welcomes the department's recognition that qualifications other than T levels and A levels are required. We recognise the value of A levels in the qualification landscape and are supportive of the ambition for T levels to provide a technical option for learners that sits alongside, and on par with, A levels and apprenticeships.

However, 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. Learners will need a choice of qualifications where: they are not ready to specialise; they are unsuited to academic style qualifications; they need flexible/part time study; or, they have special educational needs etc.

There is a need for a wide range of other funded qualifications alongside A levels and T levels at level 3 to:

- Ensure there is level 3 provision in the market for valuable sectors that **are not** represented in any of the 15 T level routes. For example, although there is a creative and design route there is no reference to either music or the performing arts. DCMS statistics 2015 show that there are 2.9m jobs in the creative economy and £19.8bn in creative exports in 2014. It will be vital to ensure the education provision continues to exist to support the continued growth of skills that are needed in this sector, and other vital sectors that are not included in the T level routes. These qualifications will need to be



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available in ways that make them accessible to 16-19 year olds (as part of a programme of study) and to adults (through more flexible delivery and assessment approaches).

- Provide learners with access to qualifications in a range of subject areas that **are** covered by the planned T level routes but which are not available to learners in their local area. The national map of provision of each T level is not yet clear. Providers in specific areas may not be able to offer T levels because the local economy will not be able to support the work placement requirement in the volume required. Alternative provision should therefore be available for those learners who lack local work placement opportunities; otherwise career options are in danger of being defined by the geographical area in which learners reside.
- Provide learners with access to qualifications in areas that are covered by T levels or A levels but are provided as more flexible options. A 2-year full time course of learning will not be suitable for some learners who need a more flexible offer such as part time, one year, short courses or distance learning. It is important that provision is available in a variety of different shapes and sizes to respond to the range of learner needs. Some learners will need to work to support themselves and a family (not only adults, but young people too) so access to provision that is more flexible than T levels and can be combined with work will be essential.
- Provide access to qualifications that can complement and enrich A Level studies and broaden the progression opportunities for learners e.g. Applied General and Tech level qualifications. Level 3 learners at post 16 would be left with a reduced offer should these qualifications be removed.
- Provide access to level 3 qualifications that are linked to specific job roles and are recognised by industry professional bodies. Some professional bodies maintain registers of appropriately qualified practitioners which demonstrates to the general public and industry that they meet UK- wide standards of practice in their work. For example, VTCT Level 3 Diploma in Complementary Therapy is recognised by CNHC for entry onto their register which subsequently allows learners to work within the healthcare sector. VTCT Level 3 Diploma in Instructing Mat Based Pilates is specifically designed for learners 16 years and over to gain employment in the fitness industry as a Pilates instructor and gives eligibility to join the Register of Exercise Professionals as a Pilates instructor (REPS).
- Provide the opportunities for learners to upskill (e.g. taking an award to add to their original qualification), to retrain and change career (e.g. adults looking to move in another direction) and for SEND groups and those who require a flexible and different style of learning.
- Provide access to learners who would not embark upon learning via traditional routes e.g. the Ascentis level 2, 3 and 4 in Community suite of qualifications which recognise and



build on learners' linguistic ability and help them to develop the complex skills needed to act as an interpreter in their community.

- Support social mobility and diversity aspirations by continuing to provide for learners with a host of different motivations and interests, especially those maturing later in terms of knowing their ultimate goal.
- Provide access to niche qualifications that complement and/or enhance the options open to young people and adults when taken in combination with other Level 3 and/or Level 2 qualifications e.g. Laser Level 3 Sport & Enterprise in the Community which gives young people and adults the business and enterprise skills for possible self-employment as well as the knowledge, skills and understanding associated with community-based employment.
- Support approaches such as Laser LEAP (Learning, Employability and Progression) based on 800+ units at a range of levels that allow providers to pick and mix according to the needs of learners, their preferred destinations and local factors determining post-learning opportunities. Designed to be flexible and encourage attainment by learners with often complex needs.
- Provide access to supplementary qualifications some learners require to enable access to employment. For example, to become a Personal Trainer having an A-level / T-level in Sports and Exercise Science or Physical Education, or similar degree programs that have not embedded professional standards within them, will not qualify learners to gain employment as a Personal Trainer. The VTCT Level 3 Combined Diploma in Personal Training which contains units at levels 2 and 3 is an occupational qualification aimed at learners aged 16+ based on the Chartered Institute for the Management of Sport and Physical Activity (CIMSPA) Professional Standards for Personal Training which enables learners to gain direct employment in the fitness industry.

There are also specific types of qualifications the department may find it useful to consider further in terms of how to support their continued availability:

- The role played by **Access to HE qualifications** in the level 3 landscape is important as these qualifications provide learners with an important route to HE where the traditional A level route has not been possible. Access to HE courses are delivered by colleges in England and Wales, and are available in a range of different subjects, such as nursing, social studies, law, and art and design. There are over 1,000 recognised Access to HE courses. All recognised courses are listed on the [database of QAA-recognised Access to HE courses](#).



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A number of the Federation's members operate as Access Validating Agencies (AVAs). It is important that Access to HE provision continues to be available to learners who need another route into HE. If the department would like to consider the detail of Access to HE in more detail, the Federation would be happy to arrange a focused discussion with a sample of relevant members.

A case study illustrating how Access to HE can impact on learners can be found here: [Gateway Access to HE](#). Further case studies can be found in appendix 1, case study 3.

- The International Baccalaureate which offers an education for students from age 3 to 19, comprising of four programmes that focus on teaching students to think critically and independently, and how to inquire with care and logic. These skills may provide learners with the ability to engage effectively in the employment market of the future which will offer jobs that currently do not exist.
- The Extended Project Qualification (EPQ) at Level 3 which has a high level of support from HE for the added value it brings to prospective HE learners. Students might, for example, be able to replace or supplement one of their results in another qualification (such as an A level) with an EPQ to meet an offer from a university.

## 9. How should we determine “overlap” in relation to:

- a) overlaps with T Levels? Please give reasons for your answer.
- b) overlaps with A Levels? Please give reasons for your answer.

The consultation document is clear that the government wants “*T Levels and A Levels to become the **qualifications of choice** for 16 to 19 year olds taking level 3 classroom based qualifications*”. If T levels and A levels are to be qualifications of choice, then they need to exist within a wider qualification offer that provides real choice for learners.

The consultation seeks to determine principles that can be applied to determine whether a qualification is of the quality required to attract government funding yet it also seeks to remove qualifications that meet these principles from funding because of some degree (to be determined) of overlap with an A level or a T level. The Federation feels that if principles are to be determined as the basis for funding decisions then it is only fair that any qualification that meets those principles should be funded.

If overlap is to be determined then points that should be considered include:



- The process for determining overlap should **not** be a tick box, desk based exercise that matches qualifications on the basis of title, subject and/or content. Ideally it will need to be a qualitative mapping exercise.
- The context of the qualifications will need to be considered in detail, taking into account the intended audience for the qualification, the assessment methods used and the primary purpose of the qualification. We have seen that the 'early progress' action within the consultation has outlined steps to remove the pre-existing versions of Applied General Qualifications and Tech levels from funding from September 2020. This is based on their being 2 versions of a qualification in the market with similar content and titles. However, what this ignores is that the qualifications are often used by different types of learners and support different progression routes. The removal of pre-existing versions will disadvantage some learners and illustrate the importance of taking a much more considered view of a qualification before it is removed from funding.
- Flexibility in the overall qualifications offer needs to be considered. This is vital for adult learners and many 16-19 learners. T levels will not be flexible enough to meet the needs of some learners, especially adults.
- In the case of T Levels, bearing in mind that they are intended to be based on the relevant Apprenticeship Standards, then it is likely that other technical/vocational qualifications at the same level will reflect the standards set out by the industry. Overlap in this sense should be seen as a positive, rather than negative factor and in the interests of both learners and employers.
- Members of the Federation have also identified that T levels are in the design phase at present and the final content is not available for consideration as part of this consultation. It is therefore not possible for respondents to be clear on where existing provision might overlap with T levels in the future.
- There is also no national map of provision across the T level routes to show which T level subjects will be available on a local level for learners. It is therefore essential that 'overlapping' qualifications are not withdrawn before there is a suitable T level in place and on offer in all areas, otherwise learners will be presented with a postcode lottery of what sectors they can qualify for depending on provision in their local area.

## **10. How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?**

The Federation is supportive of a system that provides learners with access to level 3 qualifications and does not present barriers to their progression. However, we do not believe it is the range of qualifications that are on offer to learners that prevents this progression at present. There are a number of other issues to consider:



- 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. There is ongoing debate about whether the post-Wolf review reforms to the performance tables and the focus on the achievement of the Ebacc have resulted in a reduced exposure to technical subjects in KS4. 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.
- Where learners are ready to progress to level 3 from KS4, they may not be aware of their options, other than A levels. This is because the support, advice and guidance they receive may not be adequate and may not include a focus on any option other than A levels. We are aware that the implementation of 'the Baker Clause' is underway but it is not being fulfilled by many schools yet.
- 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. There does not seem to be this option in the tripartite offer being developed by the department (T level, A levels or an apprenticeship). A more flexible offer that allows learners to mix different types of qualifications within an overall programme of study may well appeal to learners and provide opportunities for combinations of subjects that are more bespoke to the needs of individual learner.
- It is important to remember that 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.
- Not all employers want/need all employees to have level 3 skills and pushing learners to achieve level 3 skills may just result in an increase in skills under-utilisation in the workforce as we have seen with graduates see – [over skilled and under used](#)
- Some learners will move into employment at level 2 and may wish return to level 3 study at a later date. The barrier they will face will not be presented by the qualifications they seek to undertake but by other aspects of the education system. For example, financial barriers will exist that prevent some learners from progressing to level 3. [Recent research](#) across more than 2,000 UK adults found 58% of UK adults wanted to learn a new skill over the past 12 months. 63% felt it is too expensive to recruit the help of proper teachers, professionals or experts.
- It will not always be appropriate to progress directly to a level 3 programme because in some sectors the achievement of skills/knowledge at level 1 and/or 2 prior to entering level 3 is essential. For example, in Hairdressing, shampooing and cutting hair are taught at level 2 and are the fundamental basic skills needed to progress to



level 3 (as well as enabling learners to go straight into employment). Within beauty at level 2 the skills taught are skincare, eyelash and eyebrow treatments, manicure, pedicure, waxing and make-up learners enabling them to go straight into employment or to progress to level 3. At level 3 they will build on level 2 skills and also be taught a different set of skills, e.g. for Hairdressing - colour correction; for Beauty Therapy, body massage skills, the use of facial and body electrical equipment.

- There may be a gap between KS4 and Level 3 in the softer skills learners need to be successful at level 3 e.g. self-confidence, interpersonal, communication, time management and presentation skills. For example, the BIIAB Level 3 Commis Chef qualification requires timed preparation within its assessment strategy and, as such, is often a challenge to post 16 learners in the absence of appropriate provision to build their skills, their self-confidence and maturity.

## **11. How could post-16 qualification reform and broader study best support more people to achieve at level 3?**

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.

While KS4 learners are well prepared for A level study, this is not the case for technical/vocational study. Such KS4 learners will not necessarily be in a position to make definitive decisions about their career choice and must not be forced to commit to one of a limited set of predefined routes. There must be appropriate provision available to cater for such learners otherwise there is the real risk of increased disengagement. Level 2 qualifications are very necessary in this space in order to provide a foundation for progression to employment or to level 3 study.

The Federation believes that 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. 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.

Applying principles and criteria that require funded qualifications to all look and feel the same will not deliver the flexibility that learners require. For example, making external assessment



mandatory may not only present validity challenges for a qualification it may make it highly undesirable to some learners. Making sure there is a level 3 offer that provides a range of different qualification types and assessment approaches will help learners to feel confident enough to embark upon level 3 study.

Ensuring too that there is a range of qualifications available to learners at level 2 and below will aid progression to level 3. It is entirely understandable that a learner may not be ready to specialise in a T level subject at age 16. They may not have decided which subject they wish to pursue. Having a range of other, more flexible qualifications available may give them the opportunity to study a subject for a shorter period of time to determine if they really are interested in it, before committing to a 2-year full time T level.

Ensuring the transition framework for the T levels is developed to address the needs of a range of learners will be essential to ensure there is an appropriate pipeline of learners. It is unfortunate that so little is known about the transition framework at this time.

Funding of qualifications could also be more flexible in its approach to consider how learners who wish to access qualifications with low guided learning hours (GLH) but high numbers of Total Qualification Time (TQT) can be best supported. In some cases, these qualifications will be on-line and will be more accessible to learners who need to fit study in around other life commitments.

Qualification reform pre-16 may also benefit from consideration in terms of how well it supports learners to progress into anything other than A levels. Changes to performance table and the focus on the Ebacc may well make it unlikely that learners will have any knowledge of technical/vocational qualifications up to the end of KS4, possibly making it less likely they will choose a level 3 technical qualification.

**12. If level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice**

It is important to recognise that some level 2 qualifications will lead directly to employment but this is not the only purpose level 2 qualifications serve. It is important, therefore, to not restrict availability at this level to those qualifications that have a direct route into employment.

GCSEs are level 2 qualifications and are seen as being valuable even though they do not provide a route directly to employment. The work of [De Coulon and others \(2017\)](#) shows that about 45% of all below level 2 learners show a clear progression in college based vocational



education to programmes at higher levels, with 21% moving into sustained employment and 13% progressing into an apprenticeship.

The quality indicators provided in paragraph 55 will need to be more flexible if they are to enable the continuation of a range of Level 2 qualifications in the post-16 space that have proven value in supporting young people and adults into employment. It is vital that provision that motivates and engages learners who otherwise might be in danger of leaving education is continued.

Level 2 qualifications are also essential components of Employability & Development Programmes which are designed by colleges in partnership with local employers and provide an appropriate mix of college-based/work experience, learning at Level 2 and the prospect of direct employment on completion of the qualification.

Appendix 1, case study 4 provides an example of the impact of achievement of level 1 and 2 qualifications. Appendix 1, case study 5 provides an example of the impact achievement of level 2 qualifications that are not generally provided by schools but can lead directly to employment in areas that are crucial for the future of the country e.g. cyber security.

### **13. What are the key roles that qualifications at level 1 and below need to play?**

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.

Without the ladder of progression that Entry level offers, learners may experience gaps in their understanding which make it difficult for them to achieve qualifications at Level 1 and 2. Entry level Employability qualifications offer an opportunity for learners who are not yet operating at Level 1 or 2 to begin to develop employability or personal and social skills that enable them to progress onto different types of learning programmes or into supported employment. For some learners these Entry qualifications are the first time they achieve a qualification and the positive impact on their confidence and potential to progress should not be underestimated.

Level 1 qualifications provide a necessary bridge between Entry and Level 2 whereby learners at Level 1 start to demonstrate degrees of independence in the application of skills and knowledge but are yet to become fully confident in line with the requirements at Level 2.



Qualifications at Entry and Level 1 need to have portability and currency. They need to motivate learners and prepare them for progression and, as such, qualifications are the best way to safeguard quality and purposeful public funding investment. High quality qualifications are an important accountability measure for ensuring teaching and learning is purposeful, worthwhile and that progression takes place.

Withdrawal of funding from qualifications at these levels would render sizeable cohorts overlooked, disenfranchised from the national qualifications framework and would have adverse effects on social mobility.

It is important to note that qualifications at level 1 and below are taken by a wide range of learners. Some, but not all, will have special educational needs or disabilities but there are large numbers of other learners who gain value from qualifications at level 1 and below.

Roles that qualifications at entry and level 1 need to continue to be funded to play include:

- Building confidence, self-esteem and motivation to progress in learners who may not have achieved any other qualification in the past.
- Recognising learner achievements through the achievement of a nationally recognised qualification.
- Providing a basis for further progression into education at higher level qualifications including level 2, or employment.
- Providing learner with an introduction to a principle or a sector and engaging them in a subject in which they could establish a career.
- Providing a route into work roles in specific sectors of the economy. For example, REMPLOY has extensive experience of offering secure and on-going employment to learners with Level 1 qualifications.
- Building the foundations of literacy and numeracy knowledge and skills and broader life and employability skills which enable learners to progress to higher level qualifications, for example, the Ascentis Stepping Stones qualifications in English Skills and mathematical Skills (Entry 1- Entry 3).
- Providing skills that enable learners to gain the necessary skills to communicate and function in society e.g. ESOL Skills for Life qualifications.
- Delivering technical skills/knowledge required for progression to other levels. For example:
  - Engineering level 1 includes areas such as health & safety practices and identification/use of hand tools, measuring, estimation etc.



- Carpentry level 1 provides manual dexterity skills that are essential for progression to level 2 qualifications and beyond.

**14 Are there additional principles we should apply to level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.**

The Federation has nothing further to add.

**15 Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer**

The Federation believes that AOs should be allowed decide whether their pre-existing or reformed version of a qualification continues to be funded, if the department does not believe it can continue to fund two different versions.

In some cases, legacy versions of qualifications have better take up because they offer the flexibility learners need. That is why they have continued to exist in the market. Removing the legacy versions will not ensure increased learner take up of the reformed versions of these qualifications as learners may well seek a similar unreformed qualification from another AO.

Learners respond to the approach employed in the legacy versions and will seek these out rather than embark upon a reformed version.

The legacy and reformed versions of qualifications in some subjects are used by learners who are seeking different progression routes, with those seeking access to HE pursuing the reformed version and those seeking access to employment pursuing the legacy version. There may, therefore, be a need both versions in some cases.

[Ofqual 2017 research](#) concluded that Applied Generals are seen to fulfil an important role in providing pathways for students not suited to, or not inclined towards, more academic or more vocational programmes at Level 3. In creative arts, ICT and sports related subjects, they can be preferred by HEIs over A-levels.

Also, the timescale for removing the legacy versions from funding introduces risks for centres who may not be prepared for the approach required by the reformed version. It also introduces a risk for AOs who will have a short period of time to scale up provision for external assessment.

There is also a risk related to a reliance on untried T levels and their ability to meet the diverse needs of learners post-16.



**16 Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.**

The Federation believes there are a number of issues for the department to consider in relation to its approach to removing no enrolment qualifications from funding:

- A qualification with no funded enrolments may well have enrolments which are not funded. An AO may have decided to continue to offer it because it has non funded learners registered onto it. AOs cannot always differentiate between enrolments that are funded by government and those that are funded by the learner/employer etc.
- Each AO monitors the take-up of its qualifications and reviews these in line with its own regular review cycle. Where a qualification has no registrations/enrolments at all (funded or not funded), it is likely that the AO will withdraw it from regulation as part of its own review activity. It makes no business sense for an AO to continue to invest in maintaining a qualification that has no enrolments. AOs may not be aware that a qualification has no funded enrolments. If they are not aware, then it is not surprising that they do not take any action to remove these qualifications from funding.
- The Federation is not aware of a published process for an AO to follow if they wish to remove a qualification from funding but retain it on the Ofqual Register (because it attracts non-funded enrolments). There is a process to withdraw a qualification from the Register (which would then mean it was also withdrawn from funding) but this would not be appropriate if there is a non-funded market for the qualification.
- A simple administrative/housekeeping process which includes providing data on funded enrolments to AOs could help to address this issue. An example the department may wish to consider is the cleansing process used by Qualifications Wales for its QiW database of funded qualifications and the cleanse of the Register conducted by Ofqual in 2016.

In addressing this matter, the Federation believes the approach should include the following features:

- **An exceptions process** 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.
- **An appeals process** so AOs have the opportunity to appeal a decision to remove a qualification from funding. This process should be clearly articulated in a published appeals policy and should be fair, accessible and include an element of independence so AOs can be certain of fair consideration.



The Federation would hope that any messaging from the department about the removal of funding from no enrolment qualifications is respectful of the fact that there may be non-funded learners registered onto these qualifications. Removal from funding is not a reflection of the quality of the qualification and to suggest that it is would risk undermining the achievement of learners who have not accessed government funding.

**17 Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer**

The Federation believes there may be a need for some no enrolment qualifications to remain within funding (please see above). The opportunity for exceptions should be built into the overall process to ensure that qualifications which have been developed are not removed where there is a legitimate forecast for uptake in the short term future.

Each individual AO will be best placed to determine where funding needs to remain. Providing AOs with data on qualifications that currently have no funded enrolments will enable them to consider the best option for each specific qualification.

There are a number of reasons why a qualification may not have achieved any funded enrolments and need to remain approved for funding:

- A new apprenticeship standard is in development. For example, SFJ Awards have developed a suite for qualifications for Early Interventions at Levels 2, 3, 4, 5 and 6. These are the first qualifications in this area and aim to support the professionalisation of the workforce. A proposal for a new apprenticeship standard at Level 4 has now been agreed by the Institute for Apprenticeship and Technical Education. The qualification at Level 2 has not yet had any take up and the Level 3 has had fewer than 100 enrolments, but once the apprenticeship is available, these qualifications will provide a clear progression route to it.
- More time is needed to work with employers to prepare them for the qualification and to build the wider market demand for the qualification. Developing a market requires time and we would suggest a 3 year period is considered rather than the 2 year period that is proposed.
- A qualification may be part of a suite of qualifications and there are funded enrolments onto other qualifications in the suite. It may therefore be important for learner progression opportunities that other qualifications in the suite remain funded.
- The AO may be offering the qualification in the market alongside other AO who have won the market share. The AO may be planning marketing activity to grow their market share.



Any withdrawal of funding from its qualification (and not the qualifications of its competitors) would stymie its efforts. It is not clear if the department would seek to withdraw funding from an individual AO's qualification where this operates in the market alongside the same qualification, offered by other AOs.

- Some niche qualifications may be subject to cyclical registration patterns so may not attract enrolments in a 2-year period.

## **18 Do you agree we should consider removing approval for funding from qualifications with low enrolments? Please give reasons for your answer.**

The Federation believes that the most important issue to focus on is the validity of the qualifications that are funded and not the number of enrolments they achieve.

The rationale for the 100 registrations is not clear and appears to be arbitrary. This risks some qualifications falling slightly short of an arbitrary target e.g. a 99 enrolment qualification would be at risk of being de-funded but a 101 enrolment qualification would not be. This would present an interesting situation if they both met the principles and quality requirements specified by the department.

Qualifications may have achieved less than 100 enrolments because:

1. They have been purposefully developed to meet the needs of small/niche sectors which are important to the economy even though they do not require high numbers of employees. By simply withdrawing funding from all qualifications with less than 100 enrolments in a 2-year period there is a risk that provision for these niche, but important sectors such will be lost. For example, qualifications in areas such as wig making and blacksmithing will only attract low numbers of enrolments. It is vital that low uptake is not be confused with absence of need for a range of specialist crafts and trades that must not be lost to the economy/country.
2. Qualifications have been designed which meet the very specific needs of groups of learners e.g. VTCT (ITEC) Level 3 Award in Massage Using Pre-Blended Aromatherapy Oils is used by the Royal National College for the Blind (RNC), the UK's leading further education college for those aged 16+ with visual impairment. The pre-blended oils qualification provides the opportunity for visually impaired learners to achieve a qualification which encompasses the use of essential oils allowing them to gain employment within the Spa industry where the therapeutic use of essential oils is industry standard practice.
3. AOs have invested in developing qualifications in support of a specific government initiative such as Core Maths and may not have achieved a large take up.



4. Qualifications that have low funded take-up but where the overall registrations numbers exceed the stated threshold of 100 in a 2-year period. In some cases, the delivery of a course will be viable because providers have 'mixed cohorts' with some learners being funded by the government and others being self-funded or employer-funded.
5. There may be some low enrolment qualifications where there are evidence-based forecasts for registrations in the short term future, following work with employers and market engagement activities. It can take time to develop the market for a new qualification and a 2 year period may not be sufficient.

There are a number of risks associated with a blanket removal of qualifications from funding, particularly in relation to niche qualifications. To mitigate against these risk the Federation believes the department should ensure its approach includes the following features:

- **An analysis of the overall size of the sector** – this will help to ensure qualifications in niche areas are not removed from funding.
- **An exceptions process** 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.
- **An appeals process** so AOs have the opportunity to appeal a decision to remove a low enrolment qualification from funding. This process should be clearly articulated in a published appeals policy and should be fair, accessible and include an element of independence so AOs can be certain of fair consideration.

The Federation would hope that any messaging from the department about the removal of funding from low enrolment qualifications is respectful of the fact that there may be non-funded learners registered onto these qualifications. Removal from funding is not a reflection of the quality of the qualification and to suggest that it is would risk undermining the achievement of learners who have not accessed government funding.

## **19 Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.**

The Federation believes there are reasons why low enrolment qualifications should remain approved for funding. As we have outlined above, these include:

- qualifications that support important niche sectors in England;
- where the de-funding of qualifications would impact on the skills available to important niche sectors which do not have large workforces;
- where qualifications are designed for specific groups of learners with protected characteristics;



- where an AO has invested in growing the market for a qualification and has evidence that uptake will increase; and,
- where funded enrolments combine with non-funded enrolments to provide an economically viable cohort.

**20 Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND or others with a protected characteristic under the Equality Act 2010? Please give reasons for your answer.**

There is a risk that the blanket application of processes or rules could remove funding from qualifications that specifically meet the needs of learners with particular characteristics. For example, VTCT (ITEC) Level 3 Certificate in Massage Using Pre-Blended Aromatherapy Oils is utilised by the Royal National College for the Blind (RNC) and can lead directly to employment. The enrolment numbers on this qualification will not be high but it serves a very important purpose for a specific group of learners.

There is also a risk that qualifications that have been designed to develop skills in those who work with those with protected characteristics could be removed from funding. For example, qualifications that recognise skills in British Sign Language at a range of levels.

If future funding is dependent on qualifications being developed in line with a narrow and rigid set of requirements relating to areas such as size, grading and assessment, regardless of whether the approach is appropriate for the overall qualification content and purpose, this will inevitably cause a negative impact on learners from disadvantaged backgrounds or those with protected characteristics. Any learner seeking something different to the academic qualifications that they may well have already had a less than positive experience of will automatically be disadvantaged by the narrow range of funded qualifications on offer to them which are all designed to the same formula.

By creating narrow pathways, accessibility will be limited particularly amongst adults, single parent families, the prison population and those who cannot afford to pay for education which will have to be pursued through private providers in order to learn and gain employment.

**21 Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation? Please give details of any additional impacts.**

The Federation believes that these issues should also be considered:



1. **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. Without the ladder of progression that Entry levels offer, learners will experience gaps in their understanding which makes it difficult for them to achieve qualifications at Level 1 and 2. The [Social Mobility Commissions 6<sup>th</sup> Annual state of the nation report](#) highlights how Further Education provides alternative life chances for all 16 plus age groups and that 75% of disadvantaged 16 to 19 year olds choose vocational education.
2. **Having simplification of the qualifications system** as a primary driver of reform has been a concern to Federation for some time and one which we expressed in our response to the T level consultation in February 2018. The risk is that we may end up with a qualifications 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. Bringing clarity to the system could better be achieved by making sure learners have access to effective information, advice and guidance which supports them to access qualifications and progression opportunities which meet their individual needs. The risk of simplification is that it will remove the range, choice and flexibility that allows the current system to meet a wide range of needs and will result in large numbers of learners who have no suitable funded option available to them. They will either then be channelled into A levels, T levels or an apprenticeship (if they can find one) and may be more likely to fail because they are not ready for these level 3 options or they are not engaged in them – leading to increased failure rates. Worse still, it could result in increased number of young people who are Not in Education, Employment or Training (NEET). Oversimplifying the qualifications offer in an attempt to compensate for the lack of effective IAG is not an effective solution.
3. In terms of fulfilling the ambitions of the **Industrial Strategy**, we are more likely to grow a more resilient workforce if they have more flexible routes available to them and are provided with the opportunity to understand how to contextualise their skills. Many jobs of the future do not yet exist and developing learners for specific, narrow job roles will not serve them well.
4. **Availability of apprenticeships** is important if the choice of learners is to mainly be A levels, T levels and apprenticeships. It is essential that the department examines in detail what is happening in the apprenticeship market at present. With a decline in level 2 uptake



and reports that 16-18 year olds are being turned away from apprenticeships for the first time ever, it is crucial to ensure the opportunities are available to those who are depending on this work based route.

5. **The funding moratorium** proposed in paragraph 107 should be explored in greater details with AOs to identify the impact this could have on learners. The Federation would be happy to support the department in an exploration of this matter with AOs.
6. **Stability of the education system and pace of change** – there is the potential for significant changes in the funded qualification landscape as a result of the proposed reforms. The Federation’s primary concern is the impact this could have on learners those who are most in need of the ladder of opportunity provided by the range of qualifications that are currently available. It will also be important to ensure that the pace of change/transition to new arrangements does not overwhelm providers and provides sufficient lead in times for them to design new curricula if the qualifications they currently rely on are taken out of funding. It is also important that where qualifications are removed from funding because they overlap with a T level that qualifications are withdrawn only once the T level has established itself and only where it is available to learners in their own local area. Otherwise there is a risk of regional pockets of learners who cannot access funded provision in their subject of choice.
7. **Impact on learners in the devolved nations**, particularly Northern Ireland and Wales, and the range of qualifications available to them in the future. The Federation understands that education is a devolved matter. However, we believe it is important to consider the impact the proposed reform will have on learners in other countries in the UK as it could result in significant gaps developing in the qualification offer to learners in the devolved nations. T levels will not be available as part of the overall qualification offer in these nations, meaning some learners could be significantly disadvantaged.
8. **National Retraining Scheme** – this will be an important scheme to reskill people in the workforce. It will benefit from access to a wide range of qualifications that can recognise the learning and achievement of learners who need to gain new knowledge, skills and understanding to re-enter the workforce.
9. **The impact on the international potential for qualifications.** In March 2019, the Department for Education and Department for International Trade jointly launched the



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[International Education Strategy \(IES\)](#). The IES sets out the ambition to generate £35 billion from international education exports, and host 600,000 international students in the UK, all by 2030.

Technical and vocational qualifications play a significant role in the offer to international learners. The proposals to withdraw qualifications from funding in England is likely to impact on the overall international offer. The withdrawal of qualifications from funding in England will not send positive messages about the value of these qualifications. It will understandably raise a questions about why international learners/governments/employers should invest in qualifications that the government for England is not willing to invest in.

10. [The Review of Post-18 Education and Funding](#) highlights the underfunding of the FE sector over many years and the disparity between it and the funding of the HE sector. A review that considers only the qualifications on offer is unlikely to have a marked impact on how effective the sector can be in supporting the government to deliver future economic and workforce needs. The ‘steep, steady decline in funding’ which has been ‘widespread and protracted’ will need to be addressed.