



## **Federation of Awarding Bodies final response to the Department for Education's consultation on post-16 qualifications at Level 3.**

The Federation of Awarding Bodies is the representative association for vocational and technical awarding organisations (AOs) with 105 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.

This evidence submission is provided on behalf of the Federation's membership following a consultation event attracting over 70 attendees, a smaller focus group, and several further discussions with members. A draft version of the response was made available to all members of the Federation for feedback before it was finalised. While a three-month consultation period and two week extension is appreciated, we feel that the quality and quantity of this consultation's responses will have been impacted by the need for AOs, providers, teachers and other stakeholders to focus on COVID mitigations during this time and ask that this is taken into account when the responses are reviewed.

While a range of views from member views have been collected, AOs are a diverse community and our members may make individual submissions containing their own perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

### **Summary**

Overall, we have serious concerns about the proposals and the impact on learners. Our responses to the consultation questions highlight how:

- **the reforms will adversely affect learner choice and remove key routes that are widely used for progression into work, further education and study** – providers we surveyed had serious concerns about this aspect of the proposals. For example, they resoundingly agreed (88%) that withdrawing funding from level 3 qualifications as proposed in the consultation would affect the participation, achievement and progression of many 16 to 19 learners. The proposals remove the possibility of a 'third way', where learners combine 'technical' and 'academic' qualifications for progression into work or further study. Many learners currently use this route and would be forced to make a binary choice in the new landscape proposed in this consultation.
- **inequalities will be exacerbated by these reforms, as outlined by the government's own impact assessment** – rather than support a 'levelling up agenda', this will lead to a 'levelling down' of opportunities for learners. Research alongside the government's impact assessment shows a disproportionate impact on those at risk from becoming NEET, learners with BME backgrounds and those with a low likelihood of university progression (e.g. children of manual workers, in certain geographic locations).
- **the proposals will reduce providers' ability to meet the needs of their learners and local employers** – we are concerned that the restrictive rules around funding will limit the qualifications that providers can offer even if there is learner and employer demand. This will potentially exacerbate local and regional skills gaps as we look towards rebuilding our economy from the pandemic.



- **The proposed model was designed in a pre-COVID age for a post-COVID world and the timeframe for implementation is overly ambitious** – providers and awarding organisations have had to reallocate resources to focus on their COVID response and have taken a significant financial hit as a result of the pandemic. This leaves them with reduced financial and staff resources to implement such dramatic proposals in the timeframe provided. Learners currently in the system will have up to two years of learning loss, making it more challenging for them to access the reformed qualifications – this must be taken into account. The seismic impact of COVID means that these reforms, designed in a pre-COVID world, may no longer be relevant to the needs of our learners and society. We need to work collaboratively with all stakeholders including employers and providers to find solutions that meet the needs of the post-COVID world.
- **There is not a strong evidence base for implementing the proposed reforms** – much of the reforms are predicated on the success of T Levels and the T level Transition Programme when the first cohorts have not yet completed. Conversely, data gathered from providers finds strengths in the current system and a desire to retain qualifications until proven alternatives that work for all learners are in place. Wholesale system reform must be built on a strong evidence base rather than ideology.

### ***Consultation questions***

#### **Q1 – What is your name?**

Dr Rebecca Conway

#### **Q2 – What is your email address?**

rebecca.conway@awarding.org.uk

#### **Q3 – What is your role, or in what capacity are you responding?**

Head of Policy and Strategy

#### **Q4 – If you are responding on behalf of an organisation please tell us the full name of your organisation, and what type of organisation it is?**

Federation of Awarding Bodies, the representative body for awarding organisations and EPAOs.

#### **Q5 – Would you like us to keep your responses confidential?**

No

#### **Q6 – Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16 to 19 year olds choosing technical provision?**

Yes, with reservations.



We feel that the two groups of qualifications outlined in the consultation are required but they are too limited in their scope and will fail to meet the needs of all learners for progression onto higher education and work. We understand the Department's desire to simplify the landscape and would like to work with the Department to achieve this objective in a way that meets the needs of all learners.

***We are concerned that the two groups of qualifications do not meet the needs of all learners***

T Levels look set to be world class qualifications. However, we do need to acknowledge that they are very large and academically demanding qualifications that will not be suitable for **all** level 3 learners who want to take a technical/vocational route.

The Department's own impact assessment estimates that 4% of learners who are currently studying at level 3 would not be able to access the new level 3 provision (p.7). However, we feel that the learning loss caused by COVID disruption puts this potential figure substantially higher - particularly given the current lockdown and school/college closures in England. The impact assessment also highlights a disproportionately negative impact on black and Asian learners. The negative impact of any reform on learners must be our primary concern.

The Federation and our members have spoken to a range of providers (schools, colleges, ITPs) to better understand what works for learners in the current system and the impact that the consultation's proposals will have. As the comments below (from a survey of LIBF's centres) highlight, limiting options so dramatically at level 3 will have a detrimental impact on learners and the quality of provision at schools, colleges and ITPs:

*The vocational qualifications at level 3 are an essential part of a broad and balanced curriculum offer, providing our young people with the opportunity to develop key practical skills in a vocational context whilst also allowing the opportunity to study their chosen subject at HE. The abolishment of vocational courses in favour of T levels only would be a backward step in the education of our young people.*

*The provision leaves small sixth forms in trouble. This means the needy students who will struggle to go to larger providers will lose out. These are often those who are the most disadvantaged in the first place and need the support offered in a school sixth form provision.*

These individual comments are supported by a short survey of colleges, schools and ITPs that we undertook with the Association of Colleges (AoC), AELP and JCQ. 33 providers responded to the survey (15 FE colleges, 10 schools, 5 ITPs and 3 sixth form colleges). 88% of respondents agreed that withdrawing funding from the level 3 qualifications as proposed would affect participation, achievement and progression for many 16 to 19 year old students (an additional 9% could not be sure of the impact). This raises real alarm bells about the impact of the consultation proposals on learners, further underlining the concerns highlighted in the Department's impact assessment.

What will happen to the learners who will not be able to access the new level 3 provision? The Department's [own analysis](#) highlights how during a recession, less economic activity takes place – there are fewer jobs available and more redundancies, which increases the number of



NEETs. Given the economic outlook in England, stopping young learners becoming NEET must be a priority. In research conducted for the Department, [Siraj et al](#) (2014) found: *'a high incidence amongst NEETs of not knowing what they wanted to do after leaving compulsory schooling that often persisted for some considerable time. This resulted in non-linear, 'yo-yo' transitions, where young people started and stopping in either education or various forms of work.'* This research highlights how, in the current economic circumstances, reducing choice for young people is counter-intuitive and likely to lead to a rise in NEETs. Not being able to offer courses that interest learners will have an impact on retention. We ask that the Department works with employers, providers and awarding organisations to identify additional qualifications to retain in the landscape because they meet the needs of a diverse range of learners. These are qualifications required for progression through to university and work.

***The schematic creates an artificial divide between 'academic' and 'technical' qualifications***

The distinction between 'technical' and 'academic' qualifications in the proposed model is artificial, especially for 16 to 19s as many learners take a combination of academic and technical/vocational qualifications. A key blocker for young people in accessing the proposed model is the requirement for them to make a binary choice between an academic and technical route when there is currently a 'third way' through to higher education and work. UCAS data shows that the total number of learners entering university with vocationally related qualifications is growing. Over 85,000 learners applied to university with at least one technical and vocational qualification in 2019 (UCAS<sup>1</sup>). The proposals on alternatives to A levels do acknowledge that other qualifications lead to university progression yet the overall message in the consultation is that there is a clear division between 'technical' and 'academic' education that does not exist in practical terms. It is also important to note that many qualifications include both 'technical' (practical) and 'academic' (theory-orientated) elements.

Where 'technical' qualifications are subsumed into the 'academic' stream in the new qualifications model, will these be held with the same esteem by employers and technical universities as qualifications in the new technical route? If not, it's clear that reforms will limit opportunities for learners who take a blended route combining 'academic' and 'technical' qualifications, requiring them to progress into further education instead of moving directly into work.

The work-based learning route is notably absent from this consultation. There is a reference to it in paragraph 92 but no clear sense of how it fits into the bigger landscape. We suggest that it should be integrated into the schematic of the landscape to ensure parity of esteem between this and the qualification-based route.

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<sup>1</sup> Number of UK-based UCAS applicants with at least one vocational qualification calculated from the [UCAS](#) data file for figure 1, chapter 8 in the 2019 *End of Cycle* report.



**Q7 – Do you agree with the funding criteria described in paragraph 47 for the other technical qualifications we propose to fund for 16 to 19 year olds (qualifications providing occupational competence against employer-led standards which are not covered by T Levels and additional specialist qualifications)?**

We do not agree. As stated in our response to Q6, we have serious concerns about the impact that the radically reduced funded options at level 3 will have on learners.

We understand the Department's desire to simplify the landscape and reduce the number of qualifications available but feel that the proposed approach will disadvantage many thousands of learners in the name of creating a tidy diagram. Qualifications that have been co-designed with employers and are already meeting the needs of learners, providers and industry (see Case Study A in appendix 1 for one example) seem likely to be defunded as a result of these proposals. Yet, colleges, schools and ITPs surveyed strongly agree (91%) that funding should not be withdrawn from any valued qualification unless a clear replacement is available which is at least as accessible and effective for **all intended learners**. We would be delighted to work with the Department, AOs, employers and providers to identify additional qualifications that would fill gaps in provision to meet the needs of **all** learners and employers. Where qualifications are already recognised as providing a route through to work for learners and differ in structure from the T Level, these should be retained for the benefit of learners and also employers who know, understand and have confidence in these qualifications. Further consultation with these stakeholders is required to better understand what qualifications need to be retained.

We are unclear on the relationship between the Institute (who will 'have a leading role in determining whether qualifications are good quality') and Ofqual (as the regulator) in ensuring quality. We would expect Ofqual to play a leading role on quality rather than the Institute because this is an area that they already have expertise in.

Given the well-documented decline in apprenticeship starts for 16 to 19s, we are concerned by the suggestion that for some technical routes, apprenticeships may be deemed as 'the only appropriate means of gaining occupational competence.' Taken to its extreme, this would dramatically impact the skills pipeline. In sectors where practical experience is deemed essential (such as horticulture), qualifications combined with work placements/traineeships are an established route into work and also provide an opportunity to develop knowledge and skills on-the-job. This is particularly important when there is a shortage of apprenticeship places. [Pye Tait](#) (2019) spoke to 1,101 employers in the horticulture sector and found 'a lack of apprentices and (sector specific) apprenticeships in the sector' (p.80) alongside a significant skills gap. The study suggests that a lack of appropriate and available training opportunities is a key barrier to skills development and the employers surveyed stated that they were unable to fill 14% of skilled roles (such as gardeners and arboricultural consultants). With a projected increase in these roles of 23%, reducing established pathways to these jobs will exacerbate the existing shortfall in skilled labour. Occupationally focused qualifications are a necessary part of the landscape in many sectors and widespread engagement with employers (beyond trailblazer groups) is necessary to better understand what is required in the landscape to ensure that skills needs are met.



**Q8 – Should the Institute create additional T Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s)/occupation(s) and explain why.**

There are already 24 T Levels either available for delivery or in development. The programme is only in its first year of delivery and we do not yet have any effective data on how these qualifications are bedding in and upskilling young people. It does not seem timely to introduce additional T Levels.

As part of the provider survey conducted with AoC, AELP and JCQ, we explored whether there was interest in new T Levels in public services (58% in favour), sport (45% in favour), travel and tourism (36% in favour) and the creative and cultural industries (48% in favour). Providers were not enthusiastic in their support and we therefore feel that a better approach to updating provision in sectors not covered by T Levels would be to look at 'what works' in the existing provision and where enhancements might be made.

**Q9 – Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52 to 66? Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?**

We do not agree.

T Levels look like they will be world-class qualifications (we will know for sure when data starts to come in). However, the size of these qualifications and the academic skills that learners who engage with them require mean that they will not be suitable for all 16 to 19 learners. Other learners may struggle with a two-year full-time programme.

Our members felt that 'overlap' was not adequately defined in the consultation documents – does it apply to the outcomes of a qualification, to subject content? Perhaps both? We don't understand why such onus is placed on overlap as it does not seem to be of concern to providers. Providers (colleges, ITPs, schools) that we surveyed resoundingly agreed (88%) that content overlap between qualifications was not a concern if the qualifications met the needs of different learners. We feel that providers should be empowered to identify the qualifications that work best for their learners.

In deciding what qualifications to continue funding, the Department must place the learner at the centre of these decisions. Key factors to consider are: whether a qualification has a proven track record of progression onto further study or work, whether a qualification meets the needs of learners in different social, economic and geographical contexts and whether the qualification meets the needs of employers in different parts of the country (it should not matter if it aligns perfectly with the Institute's occupational maps).

**Q10 – Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?**

We agree that 'small' qualifications play a key role in the landscape. However, we feel that the proposals seem to exclude many qualifications that have a proven track record of providing a pathway to work and further study. [UCAS data](#) shows that only 58% of UK residents applied to



university with three A levels in 2019 (a decline on the previous year) and we therefore urge the Department to speak to all stakeholders to fully understand what qualifications are particularly revered by learners and by universities for further study (for both ‘academic’ and ‘technical’ courses).

Even with strong IAG and the proposed improvements to careers education, not all 16 year olds know what they want to do in the future. If they are not academic learners (A level route) and do not want to specialise in an occupational area (T level or apprenticeship), they will need to be able to access a ‘third way’ through to further study that begins to develop the knowledge, skills and behaviours that they require to progress. The discussion around this route is grounded in the idea of progression into HE but many learners will progress into a higher level apprenticeship or directly into work. There is an important place in the landscape for qualifications that combine practical and ‘academic’ learning to **give learners choice** in making these progression decisions.

As outlined in our response to Q6, we feel that the distinction between ‘academic’ and ‘technical’ qualifications is artificial and unhelpfully obscures a well-used pathway for learners. The relationship between the academic and technical parts of the diagram provided of the qualifications landscape doesn’t show how learners might pick and choose between more technical and academically orientated qualifications. Keeping these options in place will allow learners to progress onto further study (at a higher education provider or through a higher apprenticeship) or work. This view is supported by providers we surveyed with 76% of all providers (80% of FE colleges) agreeing that withdrawing funding from the level 3 qualifications as proposed would restrict students’ opportunities to combine academic and applied qualifications.

Jason Beaumont, Chief Executive at specialist creative arts provider Access Creative College (seven colleges across the UK with alumni including Ed Sheeran), highlighted the role that different sizes of vocational and technical qualifications play in meeting the needs of his learners and the industry:

*There is clearly a need for range in the size of qualifications at level 3. It is clear that learners who wish to develop skills in this sector need the flexibility to engage in a range of sizes of qualification. At ACC we have had a number of students over the last few years who wouldn’t have been able to develop their skills and abilities without smaller qualifications being available. This may have been down to a number of diverse factors including health, work, personal circumstances etc.*

We would like to see more clarity on what constitutes a small qualification – does this refer to both ‘single’ and ‘double’ awards?

**Q11 – Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?**

Yes, these are valued qualifications.



**Q12 – Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?**

There is an important place in the landscape for applied and technical qualifications that can be taken alongside A Levels with tens of thousands of learners each year following this route. There is evidence that existing vocational and technical routes to university may increase the likelihood of participation in higher education for those from disadvantaged areas ([Pember et al](#), 2019). Removing this route would disadvantage these learners.

Applied qualifications also hold currency with employers. For example, [Tata Steel](#) state *'If we are recruiting for a full-time technician... we would want candidates with a BTEC Level 3, Level 4, HNC or equivalent as we know they will have covered the competency-based tests along with having the personal attributes that we are looking for.'*

Providers have valuable insights into 'what works' for their learners. Ofqual's (2020) [research](#) on drivers of choice for centres (schools, colleges and ITPs) highlights how most choose to deliver qualifications that interest their learners (92%) and have proved to be effective for learner progression (83%). 66% of respondents stated that they deliver qualifications that are desired by local employers. A recent [Pearson survey](#) of 3,000 young learners, parents and adults, found that over 9 in 10 (93%) young learners and 84% of adults felt it was important to have a range of learning choices available to them in order to succeed in their careers. We suggest that the Department consults more widely with providers to understand what qualifications work for their learners and explore how these might fit into the new landscape. We would be delighted to work with the Department and providers on this project.

Some small, supplementary qualifications help learners to develop critical thinking and other transferrable skills that encourage personal development and equip young people for life and successful further study. They can be taken alongside more substantial technical and academic qualifications yet are not included in the proposed landscape. For example, the OCN London [Level 3 Award in Community Campaigning](#) (see Appendix 1, Case Study B), seeks to develop active citizens with a community conscience and was developed with environmental charity Friends of the Earth. Funding small qualifications such as these would give learners the opportunity to further develop valuable transferrable and life skills.

**Q13 – Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?**

We are pleased to see that the Department understands the value of applied study in sports and performing arts and we would like to see a more comprehensive list over and above these examples to better understand what other applied qualifications will be included.

We understand from the Department's impact assessment that applied qualifications considered to overlap with T levels are slated for defunding partially because *'low competition on the technical route'* will *'help to support the delivery and take up of T Levels'* (p.12). We don't feel that the detrimental impact on learners is justified by this perceived benefit. We support T Levels and expect that they will be taken up by learners that are a good fit for these qualifications. However, they cannot meet the needs of all learners and we don't feel that learners should be required to engage with T Levels because there are a lack of appropriate alternatives. We ask that alternatives that meet the needs of **all** learners continue to be funded.



**Q14 – Do you agree with our proposal the IB Diploma should continue to be funded?**

Yes, the IB is a high quality and widely recognised option that is valued for university preparation and progression. We feel that the IB's career-related pathway should also be funded alongside the diploma programme as the strengths that the Department highlights are found in both programmes.

**Q15 – Do our proposals for academic qualifications for 16 to 19 year olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high quality higher education?**

They provide opportunities for some learners to progress to higher education but dramatically reducing the applied general and blended academic/technical routes (as the proposals suggest) means that some learners will not have a way through to higher education. This will disproportionately impact certain groups of learners. [Gicheva and Petrie](#) (2018) highlight how learners are more likely to enter university using the current vocational and technical routes if their parents work (or worked) in routine or manual occupations, if they come from an area that sends a low proportion of learners to university, and if they come from an ethnic minority background. Almost half (48%) of black students are accepted with at least one vocational qualification, and more than a third (37%) enter with only vocational qualifications. Removing these progression routes without a tried and tested alternative will disadvantage these learners and impact their chances of going to university. Pember et al (2019) found that when *'when learners go to university with 'other qualifications' and study the same subject at undergraduate level, the outcomes are as good as those for learners entering with only academic qualifications.'* There is no clear 'quality' argument for culling these existing progression routes.

What makes a 'high quality' higher education course? We understand that Oxbridge and the Russell Group universities would be considered the gold standard for academic courses but institutions in the University Alliance, for example, are highly regarded for their technical courses. Specialist institutions like UAL are often ranked as amongst the best in the world in their area of expertise. We would like to better understand how the Department defines quality in HE as it is not possible to describe how to get to an outcome without knowing what the outcome is.

**Q16 – What additional support might students need to achieve the new high quality offer at level 3?**

We agree with the Department that the dramatic changes to the level 3 landscape will have a significant impact on learners being able to access study at this level. The AoC estimates that around 40% of learners will not be ready for level 3 study and are some distance away from progression to study or employment.

The Department's impact assessment suggests that 'tailored preparation programmes' modelled on the T Level Transition Programme can support learners in accessing the new level 3 provision. The T Level Transition Programme only commenced in September so we have no evidence as to how this is helping learners to access T Levels. Our understanding is that this is a very specific programme of study and that some iterations of it do not include qualifications – meaning that learners can leave their programme before completion and end up with nothing (or end up with a certificate of achievement if they choose not to progress onto a T Level). We believe that study programmes are valuable in providing a framework to support learners and



focus more on this in our evidence submission on level 2 & below. Qualifications are a vital component of these programmes because they ensure that learners who do not progress onto a T Level/equivalent level 3 qualification achieve something that gives them options for further study or employment.

Our members' experience and historic data shows that some learners are unlikely to ever get to the point where they can access one of the limited options being proposed at level 3. We would like to work with the Department and providers to further develop the model so that it meets the needs of **all** learners.

Additional language support would be beneficial in supporting ESOL learners who speak English as an additional language.

**Q17 – What additional support might SEND students need to achieve the new high quality offer at level 3?**

We welcome the proposals for additional support for learners with SEND. However, we feel that it is important to highlight, as we state in our response to Q16, that some learners will simply not be able to access the new level 3 – regardless of the support that is put into place. There is a need to offer a route at level 3 that meets the needs of all learners.

**Q18 – Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?**

Qualifications that cover aspects of personal and social effectiveness, for example, the ASDAN Level 3 Award or Certificate of Personal Effectiveness.

**Q19 – Do you agree with our proposal to fund the same academic options for adults as 16 to 19 year olds?**

Yes, with reservations.

Our arguments about the need for a blended route for 16 to 19s also apply to adults. The consultation outlines the differing needs of adult learners for 16 to 19s and it is important that this key point is reflected in the 'academic' qualifications available for adults to study.

**Q20 – Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16 to 19 year olds in exceptional circumstances)?**

We agree with this proposal. The Access to HE Diploma is a well-regarded qualification that supports learners in progressing to university.



**Q21 – Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?**

We have some reservations.

We welcome the focus on modular delivery and the understanding that adult learners need a flexible approach to teaching, learning and assessment that fits around their needs.

Members were less supportive of summative assessment being included as a principle. For many adult study programmes, continuous assessment is a valid approach to assessment that is more manageable and provides a better fit with flexible delivery. The benefits of continuous assessment were made particularly clear during the pandemic and cancellation of examinations in the summer of 2020. This was a dramatic example of how adults are sometimes unable to progress in the ways originally planned – from beginning to end in a straight line with no interruptions. Learners can ‘bank’ what they achieve along the way.

Continuous assessment does not indicate a less rigorous assessment process - many qualifications endorsed by employers and professional bodies make use of it as the most valid way to assess knowledge, skills and behaviours. For example, the YMCA Level 3 Diploma in Personal Training (Practitioner) is endorsed by the professional body (CIMSPA) and is mapped to the relevant [professional standard](#). Continuous assessment comprising a combination of internal and external assessment is used to assess whether learners have achieved the knowledge, skills and behaviours required. This includes a portfolio of evidence and a practical assessment, which is delivered continuously or at the end of the programme depending on what the centre feels is most appropriate for the learner. This approach meets the needs of adult learners by being flexible and responsive to their needs while also ensuring that they have the knowledge, skills and behaviours required to fulfil the role to the standards of the professional body.

**Q22 – Do you agree with our proposed approach to making T Levels available to adults?**

Members were, on the whole, not convinced by the proposals for adapting delivery of T Levels to make them ‘more suitable’ for adults. These are radical changes to the design principles of qualifications which were only delivered for the first time in September 2021.

**Q23 – Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?**

Offering the T Level Occupational Specialism as a standalone qualification fundamentally changes what a T Level is, undermining the original design principles of the qualification. It’s difficult to see the benefits in this when qualifications already exist in many sectors that provide a licence to practice and demonstrate that the holder has the KSB needed for an occupation.

**Q24 – Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?**

Yes, with reservations.



We agree that adults need a broader range of qualifications to meet their needs than those available in the proposed 16 to 19 landscape – particularly because of the different role played by T Levels in each landscape. However, limited insights are provided in the consultation as to what qualifications will be available in the proposed future landscape. We would welcome a further discussion around this with the Department.

We agree that qualifications should continue to be funded that are aligned to occupations outside of the current scope of the occupational maps but are in demand by employers. Some qualifications that are well regarded by employers do not necessarily align with the new occupational standards (for example, the games, animation and VFX qualification described in Case Study A, Appendix 1).

We support the proposal to continue funding some cross-sectoral skills where they lead to skilled employment. It isn't clear what qualifications in this subject area would be fundable (would, for example, applied business/management be included despite them being on the 'academic' side of the landscape for 16 to 19s?). We would like further information on what the Department envisage as being included and would welcome the opportunity to work with the Department, employers and providers to identify key cross sectoral skills and develop an associated qualifications list.

The model does not seem to cater to study routes are not highly technical and have a strong academic component but are still occupationally focused with work-integrated learning. Bookkeeping and accountancy are examples of qualifications in this route.

**Q25 – What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116 above)?**

Bookkeeping and payroll, roles in the games/web sectors that fall between digital and creative occupational routes.

It is important to note that occupational requirements evolve so it is likely that more occupations will emerge that fall outside of the scope of the occupational maps in the coming years and the post-16 framework must be sufficiently flexible to meet these requirements.

**Q26 – Do you agree with our proposed approach to reforming technical qualifications?**

No

The descriptor 'high quality' is used widely when describing the reformed technical qualifications in the consultation document but it is not clearly unpacked or defined. In the impact assessment, the Department seems to conflate quality with demand. Raising the level of demand of a qualification is not a marker of quality.

We are concerned about how long it will take to develop qualifications where an occupational standard does not yet exist but there is employer demand. The Institute will 'consider' developing a standard and once it has been developed, an AO would be able to submit a qualification for approval for 16 to 19 funding. It seems unlikely that this process would take less than 18 months



to get from start to finish and therefore, rather than support employers, it risks causing a blockage in the skills pipeline. We suggest that there should be the opportunity to fund qualifications for 16 to 19s that are in demand but are in areas where there are no occupational maps.

As a sector, we have significant expertise in quality qualification and assessment design. This can be seen in our work with business, the civil service, international governments and NGOs. For example, SFJ Awards worked with HM Prison and Probation Service (an agency of the Ministry of Justice), and other sector employers, to transform and broaden what began as in-house training courses into a rigorous, regulated [level 3 qualification](#) that improves consistency of training across the whole custody and detention environment, on a national scale. We have a proven track record of working collaboratively with the Institute for Apprenticeships and Technical Education to ensure assessment validity and reliability (through proposing flexibilities during COVID and improving assessment plans). We are keen to use this expertise to work with the Department, employers, the Institute and Ofqual to improve quality in technical qualifications.

Our members are currently participating in the qualification approvals process for higher technical qualifications and we understand from the consultation document that a similar process will be in place for level 3. Currently, this process is limited in scope – focused only on digital qualifications at levels 4 and 5. It is not yet proven to be scalable and is therefore a risk to implement within the proposed time frame.

We do not understand what the relationship is between Ofqual and the Institute in approving qualifications. Ofqual has a proven track record of ensuring quality in qualifications but the Institute's experience of this work outside of the small number of T Levels that have been developed is very limited. We would like to see a clearer breakdown of responsibilities.

## **Q27 – Is there anything else we should consider when implementing our proposed approach?**

The proposals require all stakeholders to take a leap of faith into a new and unproven system. [Rutter's](#) (2012) research for the Institute for Government found that evidence and evaluation are 'used less well and less often than they should be (p.23)' in government policy. One of the key reasons identified for this is timeliness with researchers being unable to evaluate the effectiveness of a policy intervention 'before decisions had been made and options closed down (p.18).' We can see this in play with the current consultation. There has not yet been a full year of T Level delivery and the impact of COVID means that it'll be some time before we can analyse a 'normal' cohort. Only 24% of the providers that we surveyed stated that they were confident that they were in a position to effectively deliver T Levels from 2023.

Meanwhile, since the Department started consulting on this new landscape in 2019, COVID has had a seismic impact on providers, employers and the unemployment rate in England. Research shows that training plays a key role in getting people back into the workplace. [Henehen](#) (2020), for example, found that longer and qualification-bearing training is strongly associated with job re-entry among non-graduates. We ask that the whole sector comes together with the Department to consider the role that qualifications and training will play in COVID recovery. The landscape for post-16 study must be reviewed with the goal of meeting the economic needs of the post-COVID world.



The impact of COVID has also had a significant impact on learners, providers and awarding organisations – the aggressive timeframe for implementation does not take into account the disruption caused by the pandemic. Given the current lockdown situation and unknown exit point, how are providers and awarding organisations expected to begin preparing for the proposed changes to the apprenticeship landscape in 2021/22 to ensure that they are ready to commence with reformed qualifications in 2023?

We are concerned about a number of unintended consequences of the reforms. Namely,

- It may no longer be financially viable for an awarding organisation to continue delivering a qualification at all if one or more funding streams are removed in England. This may impact adult provision in England (i.e. if a qualification is only viable because it has high volumes due to 16 to 19 funding), and in Northern Ireland or Wales where numbers can be very low for key qualifications (such as those included in Welsh Apprenticeship Frameworks).
- Low enrolments in England, as a result of changes to funding, can be used by Ofqual as a reason to de-regulate a qualification. This may impact an AO's international brand and the recognition of their qualifications in some markets. As Sally Collier, former Chief Regulator explained in a speech to the Federation of Awarding Bodies conference in 2019, where qualifications *'are not taken by learners in England, we cannot regulate them. Expansion of Ofqual's regulatory remit to include such qualifications would require legislative change.'*

The government's own International Education Strategy (2019) recognises the potential of the UK skills sector but states that *'significant reforms and changes to the domestic environment have limited international growth...'* and it has *'the potential to be significantly more successful than it is currently'* (p.31).<sup>7</sup> Department for Education [statistics](#) show substantial growth in exports from AOs between 2010 and 2016 (88% - from £140m to £270m) but continued growth cannot be guaranteed in the context of such extensive reform.

- We are concerned that the reforms will exacerbate skills shortages in some sectors because fewer learners will be coming through the system with level 3 qualifications. 79% of respondents to our survey of providers (93% of FE colleges) agreed that withdrawing funding from the level 3 qualifications as proposed would affect their capacity to meet student demand in certain sectors. We know that some sectors are already struggling to recruit level 3 qualified staff. In childcare, for example, the National Day Nurseries Association's 2018/19 workforce survey found that 77% of employers struggled to recruit level 3 employees.
- Has the government considered how these proposals intersect with the Lifetime Skills Guarantee and new focus on traineeships (some of which include qualifications) as well as the proposals in the forthcoming FE White Paper? Learners who start a qualification funded through the Lifetime Skills Guarantee may not have completed their studies before the de-funding process begins. This may impact the currency that this qualification has going forward. We suggest that a clearer articulation of these government policies is required both for the sector and for the users of these qualifications – learners and employers.



**Q28 – Do you agree with the proposed approach to qualifications in apprenticeship standards?**

No

Apprenticeship standards are at different phases in the review process and the quality of assessment plans for different standards is variable. Mandatory qualifications provide a valuable framework to support providers in delivering apprenticeship training. Where mandatory qualifications are included, they also provide a valuable check that the quality of training across the work-based and desk-based routes has parity. Removing them is likely to devalue the apprenticeship route. Mandatory qualifications also provide apprentices with something to take onto future work or study opportunities that shows the learning that they have achieved even if they do not achieve their EPA.

In some sectors, standard qualifications are vital in signifying that a person has the KSB required in their industry. Trailblazer groups do not represent all employers and stakeholders and therefore even if they agree that a mandatory qualification is no longer required, removing them is likely to cause confusion.

**Q29 – Do you agree with our proposed approach to reforming academic qualifications?**

Some agreement, some reservations.

We welcome the use of a process similar to that currently in place for PTQs because awarding organisations have experience of using this. Timeframes for the PTQ process have been very tight in recent years so we ask that timeframes take into account the work required by awarding organisations to submit their qualifications for approval. We also ask that the Department and Ofqual consider regulatory burden when developing the approvals process and any new rules that they develop.

However, as stated in response to earlier questions, we feel that the qualifications that will be included in the revised landscape are too limited. Having consulted with providers, we do not share the Department's concern about qualification 'overlap' between A Levels, vocational/technical qualifications and T levels. Ensuring that qualifications are available that meet learners' needs and include both an academic and a vocational/technical focus is essential to avoid disadvantaging learners who need this route to access further study or enter the workplace.

**Q30 – Is there anything else we should consider when implementing our proposed approach (academic side)?**

Please see the response to Q27.

**Q31 – What support is needed to smooth the implementation of the proposed reforms?**

We understand that the Department has ambitions to streamline and improve the status of technical education and level 3 study. However, these proposals are extreme and we have grave concerns about the impact on learners and the flexibility of this new approach in being able to



respond to the impact of COVID. We ask that further consultation with all key stakeholders (including the awarding organisation community, learners, employers and providers) is undertaken to explore where changes may be required to better meet learner and economic needs.

We have serious reservations about the timeframe for implementation. The new higher technical qualifications follow the same approvals process as that set out in the consultation for level 3. The higher technical process started in September 2020 for qualifications that will be available for first teaching in 2022. According to the consultation, the first reformed technical and academic qualifications will be available in September 2023. This suggests that awarding organisations will need to prepare materials for submission to the level 3 approvals process in the summer of 2021 while simultaneously working with providers to mitigate the impact of COVID-19 on learners. Employers and providers will also have their hands full in this period, responding to the lockdown restrictions and the worst economic crisis seen in our country in 300 years.



## **Appendix 1: Case studies of qualifications**

### **Case Study A: GAVFX – A qualification developed to meet employer needs in an emerging industry**

In 2017 the AIM Qualifications Level 3 Extended Diploma/Diploma in Games, Animation and VFX Skills were approved as Tech Levels. They were originally developed in 2015 in partnership with NextGen Skills Academy: a ground-breaking initiative invested in by both government (the UKCES Ownership of Skills initiative) and industry. NextGen's employer steering group consists of Sony Interactive Entertainment Europe, Microsoft, Ubisoft Reflections Double Negative, Framestore, Blue Zoo, Creative Assembly, The Imaginarium, Playground Games and Centroid, who offer their ongoing support ensuring these qualifications reflect the nature and pace of industry growth.

The qualifications were developed in response to employer identified problems with available qualifications and a recognition that graduates entering industry were not occupationally ready. Industry concluded that in order to secure graduates with the right skills and knowledge, they must enter university adequately prepared with skills and knowledge specific for the job role, supported by a sound understanding of all aspects of the production pipeline. Rather than a bank of optional units, it was imperative that essential units for demonstrating competence should be mandatory with synoptic assessment

Named as Qualification of the Year at the 2016 Federation of Awarding Bodies (FAB) Awards, these Games, Animation and VFX qualifications are recognised for their innovation in meeting the STEAM Agenda (science, technology, engineering, art and maths).

The flexibility in the qualification design has allowed centres to respond to the challenge of COVID-19 by delivering online, as praised by Minister Keegan:

<https://www.sunderlandcollege.ac.uk/the-college/news/article/mp-praises-colleges-innovative-response-to-covid-19/>.

*'AIM Qualifications and Assessment Group were selected by the NextGen employer steering group as the awarding organisation to work with industry and develop the new extended diploma. AIM's reputation for producing exceptional qualifications and their understanding of the creative industry, meant that they totally understood what was needed. The result was, an Ofqual approved vocational qualification designed to give students two years of study in a combination of art, maths, coding and vocational skills (crucially with mentorship, teaching and support from industry) that they previously weren't able to access in any existing qualification.'*

Amy Smith, Head of Talent at Framestore

*'Starting to deliver the NextGen AIM Qualifications course has been an overwhelmingly positive experience for our students, tutors and the college. With our previous course I found that sometimes we would be teaching outdated techniques or software. With NextGen and AIM Qualifications the indicative content is more adaptable and, as it's designed together with industry, I know that our students are learning the most up-to-date techniques and software available.'*

Tony Lewis, Loughborough College course tutor



*'The AIM Qualifications level 3 diploma and extended diploma in Games, Animation and VFX is a key part of the creative learner offering at Sunderland College. It offers a stretching curriculum which prepares our students ably for HE at the best institutions in the subject areas and promotes a model of 'learning by doing' as prescribed by the employers who wrote the qualification. It follows a creative work flow pattern with quick iteration of projects, followed by reflection and further learning.'*

*'Because it was entirely written by employers our staff are confident that it teaches the skills our students will need not only for further learning at HE but also accelerate their progression in the workplace. It teaches the creative and technical skills, transferable across all three sectors and wider creative industries, but still allows the student to specialise their skills in the second year, preparing them for HE. Sunderland College take advantage of the employer engagement and tutor CPD run by NextGen Skills Academy, which was designed to support to the qualification at its development, which enriches content for both students and our teaching team.'*

Jane Reed, Sunderland College Faculty Director

*'I did the NextGen AIM Awards Level 3: Games, Animation and VFX Skills course at Nescot College, graduating in the 16/17 academic year. The course taught me the key skills I needed to excel in my future career in the VFX industry and covers many areas, including the use of industry standard software, so we were all able to learn and understand how these pieces of software are used professionally. I applied for the apprenticeship very early on, I was very fortunate to be invited to an interview and was offered the position shortly after. Starting at DNEG was a massive adrenaline rush! Being at one of the top VFX houses in the industry really did have a huge positive impact and what an honour!'*

Connor Tong, L4 VFX apprentice at DNEG

*'I think I would have really struggled in my first year of university, if I didn't know the correct methods of modelling and I would definitely been a year behind, progress wise. I learned a lot of PBR workflows and traditional workflows in college.'*

Tyler Hartshorne, ex AIM GAVFX learner, studying Computer Games Art at Teeside University

*'The partnerships that the course has with many of the biggest names in the Games, Animation and VFX industries, was definitely a big selling point for me and was something I hadn't seen offered anywhere else. One highlight of the course was definitely going to London to attend the NextGen Academy Showcase event, where I was able to present my portfolio to many companies in the industry.'*

Adam Lyons, ex AIM GAVFX learner, studying Computer Arts at Abertay University

In comparison with many equivalent qualifications, this example demonstrates a more dynamic and successful approach to technical education, evidenced by the enthusiasm of industry to recruit from these qualifications directly onto apprenticeships at Level 4. Designed by industry for industry, they are continually informed and supported by the sector who are represented at AIM Board level.



### **Case study B - OCN London Level 3 Award in Community Campaigning**

[Level 3 Award in Community Campaigning](#) was initiated by and developed in partnership with Friends of the Earth, targeting the 16-18 age group. They have been working with schools and colleges to deliver the qualification.

The aim is to help learners engage and contribute to their community, take the initiative in bringing about positive change, and develop transferable skills, especially relating to communication and leadership. The outcomes are for them to understand, plan, organise and evaluate successful community campaigns.

The qualification also attracts 8 UCAS points and is an excellent qualification to support their university application.

It is currently being delivered by South Devon college and is now being taken up at Truro and Penwith college.

South Devon college have delivered the qualification to support learners to engage with appropriate campaigns on issues such as LGBT rights, supporting local young people in issues around drugs etc. As part of the teaching and learning they visited Grenfell Tower to see how other larger campaigns are organised and to gain inspiration. The learners have engaged well with the qualification.

This appears to be a unique qualification and one that is valuable in developing youth engagement, a government priority.