



**Key issues with the Department for Education's *Review of post-16 qualifications at level 3 in England: Second Stage* consultation – stakeholder version**

This document presents the key concerns raised by our members in response to the Department for Education's consultation on level 3 provision. We encourage awarding organisations, centres and other stakeholders to focus on these points in responding to the consultation. There may be additional points that AOs also wish to highlight, or some that they want to omit.

- 1. The proposed reduction of funded technical and applied general qualifications at level 3 will dramatically impact learner choice at Level 3.** We accept that there are some benefits to tidying up the technical and vocational landscape at level 3 but are concerned that these proposals go too far and will:
  - **Forces learners who want to take a technical/vocational path to specialise:** For 16 to 19s, those wanting to take a technical path will be limited to a T Level or equivalent (over 900 GLH) – forcing them to specialise when they may not be ready to. Currently, learners are able to take a broader suite of level 3 qualifications to progress to further study.
  - **Make it increasingly difficult to take a blend of A levels and technical qualifications:** Many learners take a mix of technical qualifications and general qualifications, but these proposals will make that more challenging. The blended approach is a well-used route to university for young people – UCAS data shows that 16,870 learners were accepted to UK universities for the 2019 academic year with a combination of A Levels and BTECs.
  - **Offer fewer options and a lack of flexibility for adult learners:** We welcome the acknowledgement that adults need a wider range of technical qualifications but limited insights are provided into what fundable qualifications will be available for adults in the new landscape. The consultation proposes that all adult qualifications include summative assessment, which is not appropriate for all adult learners, sectors or qualification types.



**2. Many learners will be disadvantaged by these proposals – some will no longer be able to access a level 3 qualification**

- The Department for Education’s own [impact assessment](#) shows that the changes will have a disproportionate impact on black and Asian learners, those with SEN and claiming FSM.
- The Department’s impact assessment suggests that level 3 technical qualifications will become more challenging and therefore, it will be more difficult for some learners to access them. The Department for Education’s ‘best guess’ estimate is that up to 4% of 16 to 19s currently studying at level 3 would not be able to access the new level 3 (impact assessment, p.7). This estimate does not take into account the learning loss that young people will have experienced through COVID and therefore more learners are likely to be impacted.
- The Department’s impact assessment suggests that ‘tailored preparation programmes’ can support learners in accessing the new level 3 provision but there is no evidence to support this (the T Level Transition Programme only commenced in September) and historical achievement data from members suggests that some learners will never meet the entry requirements for a T Level.
- We have concerns that the change at level 3 may lead to some young people dropping out of education. [Research](#) by Boshoff et al (2019) finds a correlation between education level and becoming NEET between the ages of 20 and 24. Learners with a level 3 qualifications across the UK are less likely to become NEET than those whose highest qualifications are at level 1 or 2.
- The Department’s impact assessment highlights how some providers ‘may find it financially unfeasible to continue operating due to insufficient students, translating into insufficient funding. This could create potential ‘coldspots’ in provision’ (p.9). Learners may not be able to access a course that interests them because of where they live.

**3. The proposals are based on qualifications that are so new, we don’t have evidence about their effectiveness. Yet, we do have evidence that shows that existing provision at level 3 is good quality and meets the needs of learners and employers.**

- T Level delivery only started in September 2020 so we do not have any data on outcomes. It is premature to use this as the model for most



funded level 3 provision and throw out provision that is meeting learner, employer and HE needs.

- We know that existing vocational qualifications at level 3 are valued by employers and 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 (66%). Why defund qualifications that already meet these needs?
- The Department's impact assessment acknowledges that 'low competition on the technical route should help to support the delivery and take up of T Levels (p.12)'. It is inappropriate to try and secure the success of a flagship government programme by forcing learners and providers to move away from qualifications that are meeting their needs. How can this be considered something of benefit to learners?

**4. The timeframe for implementation is too aggressive and does not take into account the impact of COVID.**

- 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.
- Not all providers will have experienced delivery of T Levels by September 2023 when 16 to 19 funding will be pulled for technical qualifications that are considered to overlap with Wave 1 T Levels. This is a significant risk, particularly for ITPs who have had very limited engagement with T Levels.
- COVID has had a catastrophic impact on some sectors (e.g. hospitality) and caused a significant rise in unemployment - 1 million 16 to 24 year olds and 2.4 million over 25s are projected to be unemployed by the end of the year. The planned reforms of the qualifications landscape does



not take into account these sectoral changes and the need to respond immediately to these challenges ([City & Guilds, 2020](#)).

**5. There will be unintended consequences to defunding so many qualifications using such a 'broad brush' approach.**

- 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 (if a qualification is only viable because it receives 16 to 19 funding), and in Northern Ireland or Wales where numbers can be very low for key qualifications (such as those used 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 awarding organisation's international brand and the recognition of their qualifications in some markets.
- There is potential for blockage in the skills pipeline if the proposed landscape and apprenticeships are the only routes through for certain careers/sectors. In childcare, a Wave 1 T Level subject, this is already an issue and will be further exacerbated by the reforms. The National Day Nurseries Association's 2018/19 workforce survey found that 77% of employers are struggling to recruit level 3 employees.
- Has the government considered how these proposals intersect with the FE White Paper, Lifetime Skills Guarantee and new focus on traineeships? Qualifications funded under the Lifetime Skills Guarantee and included in traineeships will be impacted by the Department's proposals.

**6. We are experts at designing high quality qualifications and assessments – let us share our expertise and collaborate on a system we can all be proud of**