



**FEDERATION OF
AWARDING BODIES**
IMPROVING QUALIFICATIONS AND ASSESSMENT IN FE AND SKILLS

Post-16 VTQ Reform at Level 2 and 3: Case Study Impact Assessment

May 2026

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Introduction

The Federation supports the intent of the reforms to post-16 qualifications. There are clear benefits to establishing a recognised third route at level 3 that sits alongside A Levels and T Levels, and the organisation of qualifications at level 2 into clear pathways that support progression and entry into employment is a positive. We are clear that the changes should bring about clearer, more cohesive offer for students that improves their prospects if we get the delivery right.

It is crucial that these reforms are successful, given the Government is grappling with rising NEET figures, and skills gaps remain a pervasive issue. The recent report from the Milburn Review emphasises the challenge and risks - [Young people and work: interim report - GOV.UK](#).

Additionally, the sector needs stability to thrive. Frequent change to vocational and technical post-16 qualifications is destabilising for all and costly. It is essential that these reforms last and usher in a period of stability.

Getting the changes right first time is in everyone's interest. The fast-paced timelines make this more challenging. While we understand the rationale, it introduces further risk into comprehensive system change.

Our review of a small sample of subjects highlights areas where we believe additional focus is needed to ensure the qualifications reforms deliver for students, providers, employers, and the wider system from the outset. While we have focused on a small number of subject areas, we believe that there will be wider applicability to other subject areas:

We believe that [DFE's implementation plan](#) is positive. Notwithstanding, our observations are:

1. The focus on supporting students into work needs to continue, including directly from level 2 and 3 pathways and through apprenticeship routes:
 - a. Over 28% of students who finished level 3 study at 18 move into non-apprenticeship employment.
 - b. Apprenticeship opportunities are not sufficiently numerous or geographically spread, and the budget is not there to accommodate the increase that would be required.
 - c. Whilst T Level accessibility, availability and completion rates can be increased, it is unlikely that they will be the choice of all students wishing to enter work from Level 3 and V Levels are driven towards progression to HE.
2. Greater flexibility on partnering at Level 3 may be needed to meet sector needs:
 - a. Large qualifications currently play an important role in specific sectors, and it appears unlikely that T Levels will fill this gap without significant further change.
 - b. The model at Level 3 is a significant change; additional flexibility would support the delivery of coherent study programmes that prepare students for a range of pathways and provide them with options.

The examples set out in this paper illustrate these issues, but they are not necessarily exclusive to these subjects.

Without further attention, we believe that these realities may result in an increased number of NEETs.

The Federation intends to take this work further by exploring how entry into work can be further supported without undermining the aims or key tenets of the reforms.



Data Sources and Review

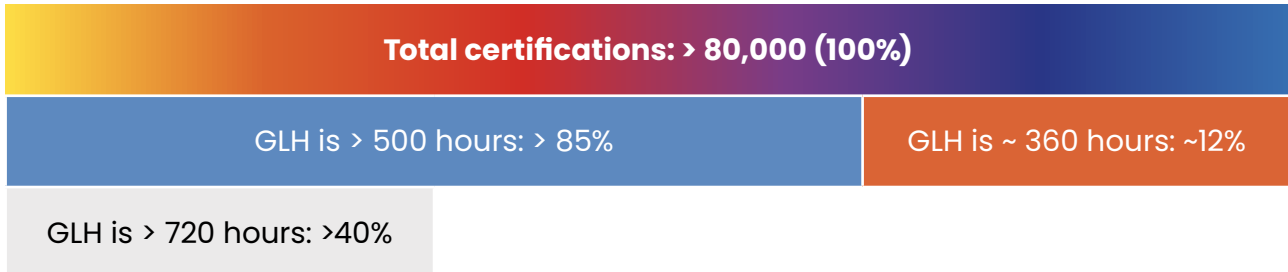
- [Ofqual data on certifications](#) was used as the basis for this analysis. Extracted on 24/4/26. Total certifications for 2025 were included for analysis.
- For the purposes of this analysis, only qualifications that were currently available for 16–19 funding were reviewed. [DfE data](#), extracted on 24/4/26, was used to identify qualifications currently available for 16–19 funding.
- Entries for each subject were then manually reviewed, with exclusions made based on qualification title where appropriate (for example, Graded Performance Examinations were excluded from the Creative / Performance Arts analysis).
- For apprenticeship starts data, 2024/25 academic year data from the [DfE Dashboard](#) was used.
- For average apprenticeship funding band, [Skills England's website](#) was used to identify current funding bands for relevant apprenticeships and the mean was taken.
- DfE's '[Explore Education Statistics](#)' site was used for information on T Level enrolments.

We recognise that there are limitations with this data. While we have taken care to ensure that only qualifications eligible for 16–19 funding are included in the analysis, we have not been able to remove the small proportion of certifications that were achieved outside of this funding stream. In addition, we have also been unable in this approach to exclude nested qualification.

We accept that some figures on certifications may be a slight over-representation of the actual number of students at 16–19. However, we are confident that the trends presented here are reliable and this does reflect potential issues with the implementation of new Level 2 and 3 qualifications. In particular, where data refers to qualifications with a GLH over 720 hours, a significant proportion of this will be accounted for by large 1080 GLH qualifications and we are confident these figures are an accurate reflection.

Creative and Performing Arts

Current state – Qualification Certifications at Level 3



Over 80,000 qualifications were awarded in 2025. Of these:

- Over 85% were in qualifications with a GLH greater than 500 hours
- More than 40% were in qualifications with a GLH greater than or equal to 720 hours
- Only ~12% were in qualifications with a GLH of around 360 hours

The majority of students on Creative / Performance Arts qualifications at level 3 are on larger programmes of study. Over 30,000 qualifications with a GLH of 720 hours or more were awarded in 2025. (Note there are a small proportion of certifications on programmes below 360 GLH). Anecdotal evidence is that a significant number of the students who take performing arts qualifications have educational needs that they perceive that they have limited alternative options.

Current state – Qualification Certifications at Level 2

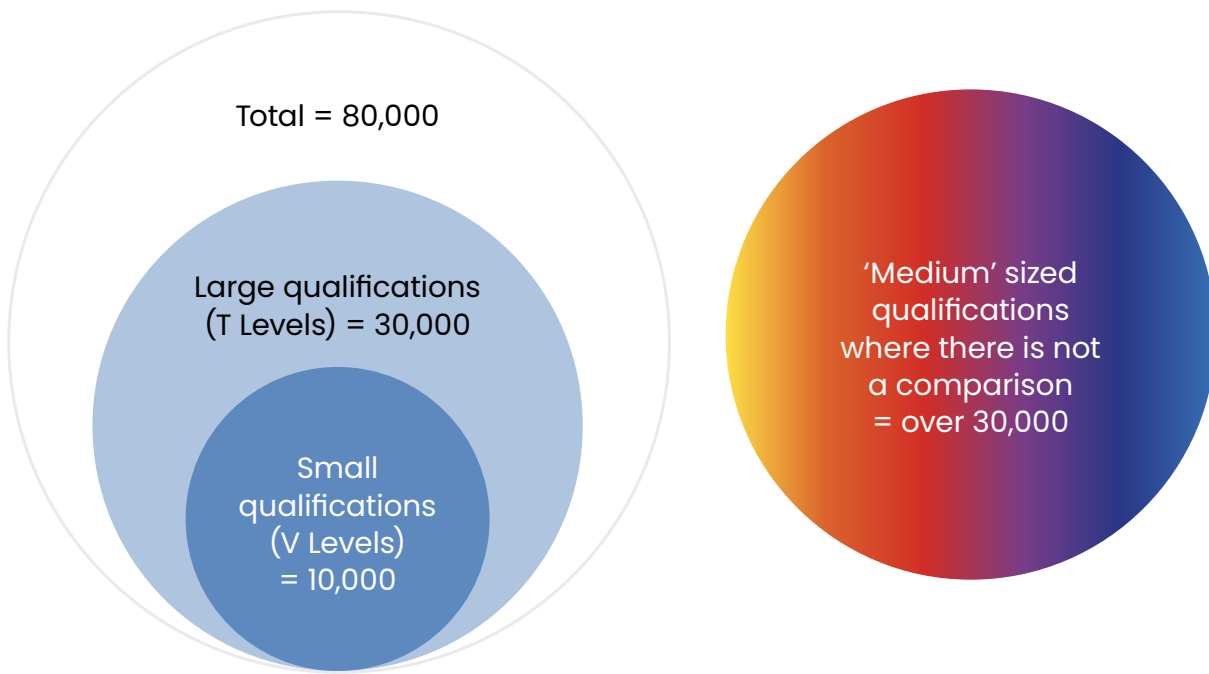


In 2025 there were over 20,000 awards of Creative / Performance Arts qualifications at level 2.

Level 2 qualifications within the Creative / Performance Arts sector primarily play an important role in support students into further study.

Future State – Qualifications Landscape Post Reform

Level 3



Translating the current state onto the future landscape at level 3:

- Those currently on a small qualification would typically take V levels
- For those taking large qualifications, over 720 GLH, it may be most appropriate to take a T Level
- For those taking a medium sized qualification (between 500-720 GLH) there may not be a natural equivalent in the new system, which would require a change in the approach to study for these students

This data demonstrates the scale of the challenge in changing the shape of the qualifications system at level 3. Fundamentally this requires significant change to the type of qualifications large numbers of students take, which has implications for delivery, assessment, information advice and guidance, and system capacity.

The Government intends for V Levels to be small qualifications (360 GLH). Currently, similar qualifications only account for approximately 12% of awards in this sector (< 10,000).

T Levels would be the replacement for large qualifications. There are a number of challenges with T Levels for the Creative / Performance Arts sector. There is a question as to whether appropriate occupational standards are available to develop content against. The nature of employment in this sector means that individuals are often self-employed or employed on shorter-term contracts. While recent changes to the rules



for industry placements may be supportive here, this makes the industrial placement element of a T Level challenging for this sector. Additionally, existing large qualifications work in this sector because they give students a broad base of knowledge and skills from which they can progress. An occupationally focused T Level may be difficult to implement in this sector.

A direct comparison from the current state to the future state (as set out in the diagram above) would suggest that T Levels in the Creative / Performance Arts would need to replace approximately 30,000 qualification awards (the number of certifications of large qualifications in the Creative / Performance Arts sector). For comparison, in 2025/26, the largest T Level (Education and Early Years) recruited 5,723 students and the total enrolments across 21 T Levels was 27,446.

It does not seem reasonable to expect that T Levels will fill the gap left by large qualifications in the Creative / Performance Arts sector. Given the popularity of large qualifications in this sector, it is also not clear that small qualifications can fill this gap without significant changes in student preference and behaviour. Particularly where students typically will not be permitted to take more than one V Level in the same subject/sector area.

Additionally, there are approximately 30,000 'medium' sized qualifications awarded in this sector (500-720 GLH). Students on these programmes would either need to be moved onto a large T Level or take a mixed V Level / A Level programme of study. This is a significant population of students to shift to a new model of study post-16, and suggests that either T Levels will need to absorb a greater share of students or a significant change in the approach to study is needed for these students as they access small V Levels.

This leaves two cohorts where further thought is needed to ensure viable options in the new system within this subject:

1. The over 30,000 on large (720+ GLH) qualifications
2. The over 30,000 on medium (500-720 GLH) qualifications

While it is feasible that some changes to student choice will lead to the V Level / A Level system and the T Level system absorbing some of this capacity, it seems highly unlikely that students needs will be entirely met by this approach.



Apprenticeships in Creative / Performance Arts

Apprenticeships in this sector on the whole are not well established, with a total of 1,260 starts on Creative and Design apprenticeships in 2024/25. There are few, if any, apprenticeship standards specific to the performance arts. There are 23 Level 3 standards within the wider Creative and Design Route. These tend to focus on the creative / craft sectors and on media. There are a small number (two) of apprenticeship standards at Level 2 in the Creative and Design Route.

Total starts on Level 2 apprenticeships 2024/25	0
Total starts on Level 3 apprenticeships in 2024/25	< 1000

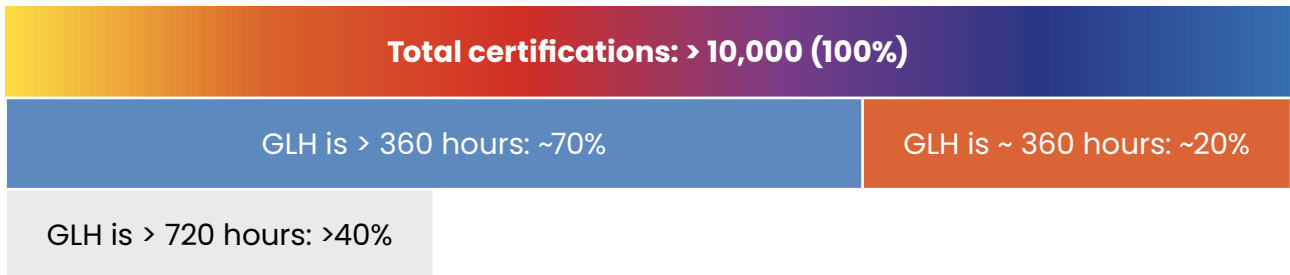
While starts on these apprenticeship routes are relatively low, funding bands are comparatively high. The average funding band for a Level 2 apprenticeship is £10,000. The average for a Level 3 apprenticeship is £15,000.

It is clear that apprenticeships would not be the solution to the potential gaps in provision presented by the above analysis of the qualifications landscape, only a five-fold increase in apprenticeships at level 3 (taking the total number of apprentices to 5000) would cost in the region of an additional £60M. The qualifications route is the dominant route for students looking to enter both further study and careers in the creative arts, and this is the rationale behind the broad-based education they currently receive through the qualifications offer.



Animal Care (including Veterinary)

Current state - Qualification Certifications at Level 3



Over 10,000 qualifications were awarded in 2025. Of these:

- Approximately 70% have a GLH greater than 360 hours
- Over 40% have a GLH greater than or equal to 720 hours
- Only approximately 20% were in qualifications of ~360 hours

A T Level in Animal Care and Management became available in 2023/24. In the academic year 2025/26 this T Level enrolled 1,873 students. (Note there are also a small proportion of certifications on programmes below 360 GLH).

Current State - Qualification Certifications at Level 2



In 2025 there were ~ 7,000 awards of Animal Care certifications at level 2. Within the Animal Care sector, programmes at Level 2 typically both support students into further study and support them into skilled employment.

Future State – Qualifications Landscape Post Reform

Level 3



In a scenario where the choices for students at Level 3 are a large T Level or a small V Level, it may be reasonable to expect that within Animal Care:

- T Level numbers may need to more than triple, from less than 2000 to approximately 6,500 to account for students currently studying large or medium sized qualifications in this subject. Industry placement capacity is likely to be a barrier here, although we recognise that DfE's recent changes to industry placement guidance will be supportive.
- The number of students taking a small qualification in this subject (a V Level) may need to increase by approximately 75%



Apprenticeships in Animal Care

The apprenticeship system is well established in the Animal Care route, with three relevant standards at Level 2 and 5 relevant standards at Level 3, and more than 1000 starts in 2024/25 across these standards at both levels.

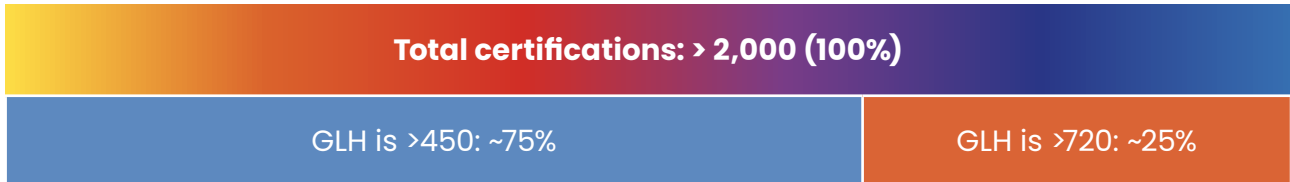
Total starts on Level 2 apprenticeships 2024/25	> 1000
Total starts on Level 3 apprenticeships in 2024/25	> 1000

Within the route, standards at Level 3 are relatively expensive, with an average funding band of £12,600. Should T Levels capacity not be able to increase to accommodate all the students currently on large programmes, then the number of apprenticeships at Level 3 in Animal Care would need to increase. Increasing the number of apprenticeships at Level 3 from 1000 to 3000 would cost in the region of £25M.

As referenced above, qualifications at Level 2 within this sector often support students directly into work. Without a strong offer at Level 2 to support students into the right occupations, it is assumed that the apprenticeship system would need to absorb the additional capacity. The average funding band for a Level 2 apprenticeship in animal care is £5000.

Electrical

Current State – Qualification Certifications at Level 3



Over 2,000 qualifications were awarded in 2025. Of these:

- Approximately 75% have a GLH greater than 450 hours
- Approximately 25% have a GLH greater than or equal to 720 hours

Relevant T Level routes for electrical installation include:

- Electrotechnical engineering
- Electrical and electronic equipment engineering

Combined, these routes had approximately 700 starts prior in 2024/25.

Current State – Qualification Certifications at Level 2



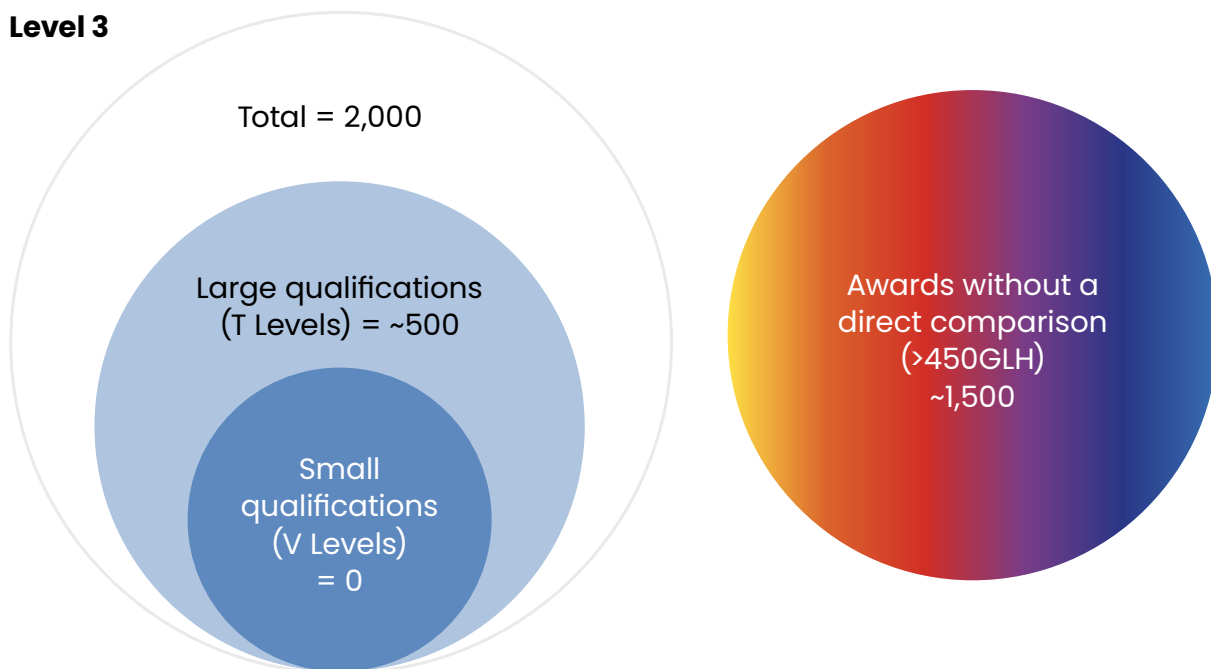
What is clear and is supported by data and anecdotal evidence is that for electrical installation, it is common for students to begin study in an FE College at level 2 before progressing to level 3 study.

This is an important progression pathway that supports students to access training at the level that is right for them and provides a clear progression route into skilled employment.

However, there is currently no occupational standard at level 2 for electrical installation. This may present a problem should occupational certificates only be developed where an occupational standard exists. This example highlights where some flexibility in approach is needed, to not only account for the availability of occupational standards but to account for typical classroom-based training patterns.

Future State – Qualifications Landscape Post Reform

Level 3



It is reassuring that the DfE's implementation plan recognises that a different approach for onsite construction is needed at level 3. Without this:

- The T Level routes would need to accommodate 500 additional learners, taking the total to ~1,200 students
- Where currently approximately 1,500 students take a medium sized qualification at level 3, it is unclear what option would be available for these students without more flexibility in the offer at level 3. Given the future qualifications landscape, we would question whether it is realistic to expect that these students would also access a T Level.

DfE will provide further information on a number of subjects for which an alternative solution is needed by early 2027. This flexibility is a welcome step to consider the individual characteristics of specific subjects, and we believe this must include the electrical pathway at levels 2 and 3.

Level 2

DfE are committed to continuing to review the arrangements for some subjects, and it does seem likely that electrical could be one of these. Based on the published subject list for Occupational Certificates in the DfE's Implementation Plan, students would not have an electrical installation option at level 2 to pursue. As referenced above, this route accounts for thousands of students. We believe this is a clear gap in coverage, driven by a system designed around occupational standards and would encourage that electrical is considered. This illustrates our belief that flexibility is needed in the consideration of typical study routes students take as well as the occupational standard coverage, in order to ensure we avoid gaps in provision.



Apprenticeships in Electrical

Total starts on Level 2 apprenticeships 2024/25	> 600
Total starts on Level 3 apprenticeships in 2024/25	> 9000

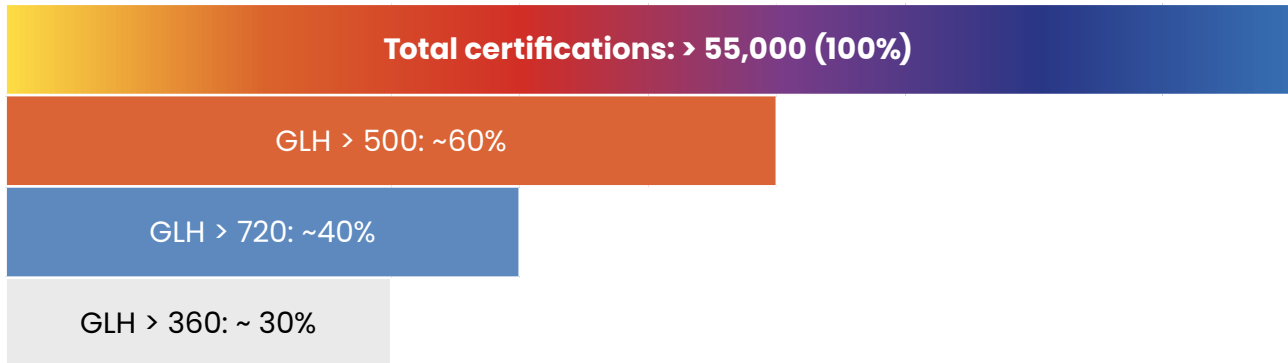
Level 2 apprenticeships in electrical have relatively a low number of starts. It should also be noted that these are not on pure ‘electrical installation’ apprenticeships, but what might be considered ‘adjacent’ pathways. This, along with the number awards of level 2 qualifications, highlights the importance of maintaining a strong occupationally focused electrical offer at level 2 despite there not being an aligned occupational standard.

At level 3, apprenticeship routes are well established. However, we have highlighted a gap in the future qualifications offer at level 3. For the apprenticeship system to absorb this 1,500 gap (the number of awards of medium sized qualifications), the cost to the apprenticeship budget would be approximately £13.5M.

Additionally, apprenticeship opportunities are not evenly spread geographically. Of the 32,000 apprenticeship starts on the Construction and Built Environment route in 2024/25, only 7.3% of these were in the North East. Approximately half the number of opportunities there were in the North West and the South East. We believe this again highlights the importance of maintaining a viable qualifications-based route for electrical at this level.

Sport & Leisure

Current State – Qualification Certifications at Level 3



Over 55,000 qualifications were awarded in 2025. Of these:

- Approximately 60%, or 34,000, were in qualifications with a GLH of over 500 hours
- This includes approximately 22,000 (or 40%) where the GLH is greater than or equal to 720 hours
- Approximately 20%, or 17,000 qualifications were awarded where the GLH is around 360 hours

There are a small number of qualifications awarded with a GLH lower than 360 hours.

Current State – Qualification Certifications at Level 2

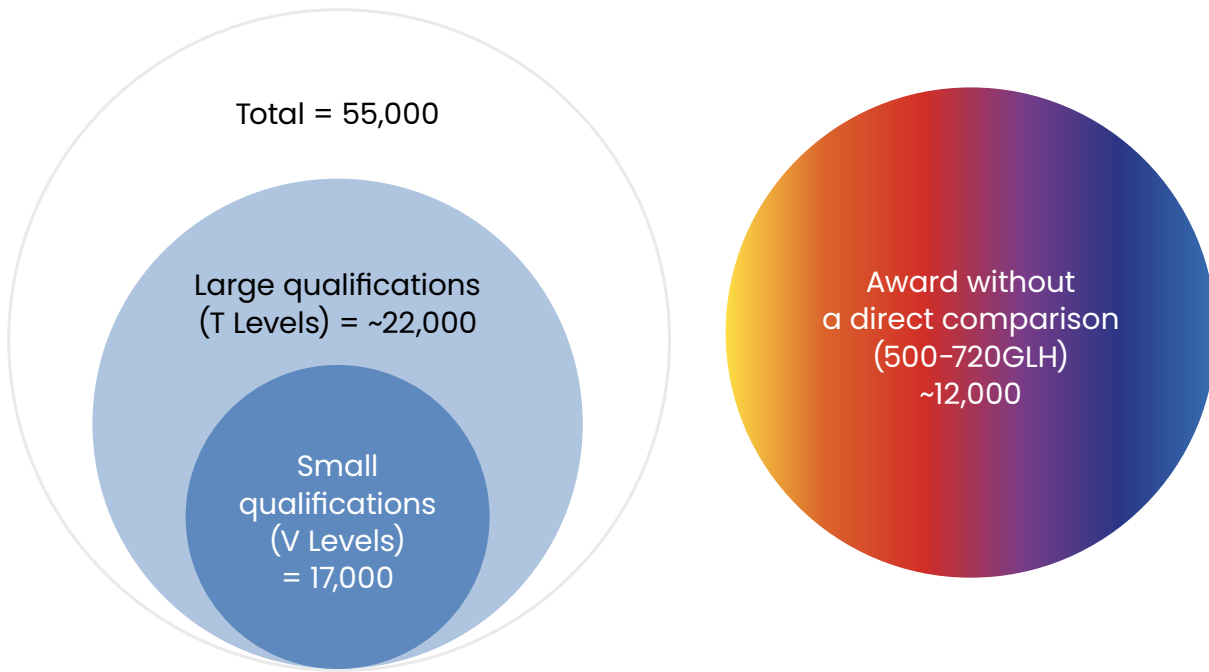


A significant portion of the qualifications awarded at level 2 are in practical subjects aligned with gym instruction and personal training.

While there is not an occupational standard at level 2 for this, this highlights the importance of flexibility within the occupational certificate system to align both with existing occupational standards, but also with typical classroom-based learning patterns. Anecdotal evidence tells us that qualifications in the sports and leisure subject areas are key for keeping students engaged in education who may otherwise be at risk of becoming NEET1.

Future State – Qualifications Landscape Post Reform

Level 3



Translating the qualifications awarded at level 3 onto the future system:

- A large qualification, a T Level, may need to replace approximately 22,000 certifications
- There is a robust market for V Levels in this sector, with approximately 17,000 small qualifications awarded in 2025
- There is a potential gap of approximately 12,000 medium sized qualifications that don't fit in future structures, and will need to be shifted to either a large study programme (T Levels) or a mixed V Level programme

As with previous examples, it seems unlikely that a T Level in this sector will be able to replace over 20,000 certifications, in the short term, even with significant change to the T Level model. Note that this requirement may be higher to absorb the transition from medium sized qualifications. As with other subjects, this data highlights the scale of the change required at level 3 to shift to the new structure at level 3. There is a risk of the new system not meeting the needs of all students in this subject, therefore raising the risk that students may fall out of the system in a subject that is effective at retaining students who risk becoming NEET.



Apprenticeships in Sport & Leisure

Total starts on Level 2 apprenticeships 2024/25	< 1000
Total starts on Level 3 apprenticeships in 2024/25	< 1000

There are relatively low numbers of starts on apprenticeships at both level 2 and level 3 in this sector. This may reflect the relatively small number of standards (three at each level) available. This highlights the importance of retaining viable qualification pathways at both level 2 and 3 for students.

At level 2, the average funding band for an apprenticeship in this sector is £5,500. Should there not be an attractive occupationally focused route at level 2 for students, then it would cost £71.5M to provide the equivalent number of apprenticeships. While it is clear a simple transfer of all students from one system to another would not occur, it is clear that both the number of apprenticeships available and the finances do not allow the apprenticeship system to absorb significant numbers of students from the FE system.



Summary & Recommendations

While we have acknowledged that there must be a degree of caution in the interpretation of this data, based on the known limitations with the analysis, we are confident that the analysis of qualification certifications across these four subject areas is sufficiently accurate to highlight a number of key challenges with the implementation of reformed post-16 qualifications. This is supported by qualitative evidence from the Federation's members.

As stated in the introduction, we support the intent of the reforms and wish to see them succeed. There are clear benefits in the reformed system, not least the development of consistent pathways that are easily understood by students, parents, and employers. This report is compiled, and the issues highlighted, to support in addressing these concerns ahead of delivery to ensure the system works for all and therefore has longevity – something that has been lacking in recent post-16 VET reform.

[DFE's implementation plan](#), published in May 2026, is a positive step forward. On the whole, the breadth of subject choice for Occupational Certificates, the approach to subjects that don't fit neatly into the new structure, and the ambition on T Levels is supportive.

We believe the following should be considered to successfully deliver the change:

1. Focus on occupational routes and pathways into employment

The system must be sufficiently flexible to support students into employment in occupational routes, alongside the other stated purposes. This requires considering where an occupational certificate at Level 2 is needed, despite an occupational standard at this level not being in place. The system must be suitably flexible to consider both the standards in place and typical classroom-based study routes.

We strongly believe the system must do more at level 3 to support students into work. V Levels are designed primarily to support students into higher education, which is not

a purpose we are challenging. However, when over 28% of students who finished level 3 study at 18 progress into non-apprenticeship employment, it is vital that the system at level 3 **also** supports this. More could be done to ensure that V Levels support this significant cohort without undermining the HE purpose. Additionally, the Government may wish to look to Wales for an example, where thought is being given to alternative qualifications that provide students with the skills they need to enter the workforce

2. Greater flexibility on qualification size at level 3

The reviewed sectors highlight the challenges posed by a rigid model of qualification size that looks neat on paper, but doesn't account for the complexities of the sectors and students these qualifications serve. While the DfE's announcement on partnered V Levels is welcome, we continue to believe that further flexibility may be needed here to ensure that students have coherent study programmes available to them. The stipulation that a student would only be able to study up to 720 GLH in the same subject area in a relatively small number of circumstances may be restrictive. If a similar rule were applied to A Levels this would rightly be seen as a backwards step. The example provided of Maths and Further Maths may be considered an example of vertical partnering. Horizontal partnering may be needed more, in order to ensure appropriate breadth and depth of learning.

Consideration also needs to be given to the size of the subject area V Levels are covering; reducing the range will increase the density and thereby the content that is relevant to employment. More AOs also need to be enabled to enter the V Level market.

3. The apprenticeship system does not have the capacity to fill the gap

As set out above, increasing apprenticeship volumes to fill the 'into employment' gap faces three major obstacles:

- The apprenticeship opportunities are not currently there (above all, an apprenticeship is a job, and relies on employer recruitment)
- Where apprenticeship opportunities are available, they are not evenly geographically distributed
- There is not sufficient headroom in the apprenticeships budget to absorb the additional capacity – it would be too costly

The changes to qualifications should not be considered in isolation, and only where qualifications and apprenticeships work as part of a coherent system will students be provided with the opportunities needed.

We have highlighted the issues in the electrical case study around student progression from level 2 to level 3 study. This model is common across other subjects, such as hair and beauty, catering, and other construction occupations. The new structure at level 2 and 3 does not facilitate this, and it is therefore reassuring that the DfE are considering alternatives for subjects such as these that they will set out in 2027.

4. There is some way to go before T Levels fill the gap – we should consider what changes are needed

At the time of writing, we know that DfE are undertaking an intense programme of work looking at the T Level programme and how this can adapt to meet the needs of students in the future landscape. The ambition for change signalled in the DfE's implementation plan is also reassuring. This will be vital to ensuring that T Levels are successful as the sole large qualification at level 3. However, given the timescales for reform it remains difficult to see how T Levels can attract the volumes of students that might be necessary. We should consider what realistic expectations are regarding T Level enrolment numbers, and the role they play in the new qualifications landscape. T Levels are hugely successful for the students that take them, but in order for the system to succeed both the scale of adjustment and the pace of implementation needs to be considered.

These adjustments will be critical for Wave 2 of the reforms. Our fear is that, if these adjustments are not made the number of NEETs will rise as students emerging with the reformed qualifications will be less prepared for work, with the result that:

- The credibility of technical education will be damaged
- The reforms will be subject to further significant reform
- The prospects of a cohort of young people will be damaged.