

## **Response to Department for Education consultation on post-16 qualifications at Level 3 and below**

Response submitted: 10<sup>th</sup> June 2019

### **Principles – Purpose and necessity**

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

#### **Response**

We very much welcome the Department for Education's goal of presenting students with a much clearer, simpler suite of qualifications at levels 3 and below – and the recognition that 'one size does not fit all'. There needs to be enough flexibility to meet the needs of different types of students, including SEND, adults upskilling/reskilling, NEETs and those studying part-time. We also fully support the review's ambition of having a positive effect on disadvantaged students and agree that each option, whatever its level/type, must be high-quality and support progression.

To achieve this, the following principles are vital:

Strong and consistent messaging that vocational/technical options, apprenticeships and academic options are all equally valuable and valid. This must be supported by an extensive communications/marketing campaign championed by leading figures from all sectors and levels of society. T-levels will fail unless, as a nation, we banish the myth that A-levels are the gold standard and technical/vocational routes are for 'other people's kids'. Imagine how powerful it would be if a Secretary of State or minister's child opted for T-levels or an apprenticeship.

Presenting information to young people about all three routes (technical/vocational, apprenticeships, and academic) at a much earlier age, with greater adherence to the Baker clause. This should begin in the final year of primary school, and escalate through years 7-10, and needs to start immediately for children to make informed choices from equally-weighted options in time for the first cohort of T-levels. We would also urge DfE to address the barriers faced by FE schools liaison/outreach teams by ensuring schools give them the same access that universities have.

Students should be presented with clear, comparable information about the structure, assessment and projected benefits (including routes into employment and further learning) of the different options open to them. This needs to include opportunities to switch between different types of learning and transfer skills/qualifications as they progress: for example, into degree apprenticeships, academic degrees, and lifelong learning (reskilling/upskilling).

We welcome the introduction of T-levels, with a pilot in 2020. As one of the UK's largest providers of tertiary education, however, we know that students' progress is not always linear. As the consultation document notes, one size does not fit all and we have grave concerns that expecting all Level 2 students choosing technical/vocational college-based routes to commit to T-levels (in their proposed format) is not only unrealistic – it is also setting many up to fail. As proposed, a T-level will be the equivalent of 3 A-levels. Unlike A-levels, however, there will be no recognition of partial attainment (e.g. 1 A-level or 2 A-levels). We would strongly urge the DfE to ensure that students who choose technical/vocational options will continue to have a choice of more flexible and/or bite-sized level 3 qualifications. Otherwise, we fear the proposals will further disadvantage students with SEND, adult learners, and NEETs seeking to re-engage with education/training.

Instead, we would suggest a tiered approach that includes: transition between 2 and 3; an entry qualification (perhaps similar to the old AS); and a technical/mastery level outcome (full T-Level) which is valued by students and employers and is also a staging post to Level 4 and above. We believe a tiered approach is essential to gain commitment of large groups of students who currently benefit from this stepped approach.

Changes (such as the introduction of T-levels and any removal of existing qualifications) must be carefully orchestrated to ensure the system is not destabilised. We have concerns that the proposed timescale does not allow enough time for learning from the T-level pilots to be understood and absorbed. The complexity of the current market means it is vital that awarding bodies and providers (including FE colleges) have enough time to implement changes properly.

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

### **Response**

Yes. They are crucially important to many of our students, who feel a huge sense of achievement in having a recognised qualification. The motivation they draw from this means they are highly-effective building blocks for students who need additional support throughout their learning to achieve their overall academic outcomes.

Many of our most disadvantaged students not only come from low/no income households – they also have complex personal backgrounds which mean they start furthest from the employment market and require a wide range of initial support to change what are often ingrained behaviours and attitudes. These soft skills, gained in bite-sized learning chunks, also enable students to gain personal confidence and become more work-ready.

As an example, they currently provide a bridging qualification for 16-18 and ESOL adult learners with Level 3 capability but who need added skills at Levels 1 and 2 before they can progress. This group is not small – we currently have 2,500 students completing employability + qualifications at The Manchester College.

The PSE skills they provide are also hugely valuable for ESOL students seeking to integrate and engage with their local community, developing relationships and understanding British values and British society. They are also critical in enabling SEND students to engage with the workplace and industry placements.

### **Principles - Progression**

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

### **Response**

Like colleagues elsewhere in HE and FE, we believe it is important to use a range of measures that provides a rounded picture and reflects the full value of a qualification over time. Many students do not follow linear paths, and short-term outcomes may reflect a student's personal circumstances or the wider economy. The measures used to assess the success of existing qualifications must include:

- Clarity on the overall 'value added' by a qualification

- Initial, medium and long-term employment outcomes and salary levels
- Retention, progression and achievements, related to the students' qualifications on entry as well as their final outcomes
- Measures of digital literacy, functional skills and overall employability
- Data from employers – linking skills / levels to requirements more accurately

As the consultation document makes clear, the evidence currently available is largely reliant on data from the HEI system. This creates a positive bias in favour of A-levels at the expense of technical/vocational options. The fact there are ample national datasets on students' progression into university and their employment post-university, compared with a dearth of comparable data on technical/vocational routes (exacerbated by frequent change to these qualifications) unfairly disadvantages the technical/vocational sector. It also means there is little evidence on whether schools are complying with the Baker clause and promoting technical/vocational qualifications and apprenticeships as equally valid alternatives to A-levels.

This must be addressed and we have suggested how this might be done in our response to the next question.

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

**Response**

We want to ensure that government, regulators, providers, employers, students and their parents/carers can access clear, easily-comparable and consistent information about the quality of different qualifications. This will require a national approach to data collection and reporting that is properly regulated (i.e. linked to outcomes, quality and funding), and consistently applied for all providers of qualifications at level 3 and below.

Outcomes data should be regionally adjusted to take account of differing labour markets for employment and salary, but it should be published annually to create a clear picture for anyone seeking information about these qualifications. It is particularly important that students and their parents/carers can access this information in a way that is easily-comprehensible and easily-comparable so they can choose the best educational pathway to employment for them.

As mentioned previously, it is also vital that the data enables proper evaluation of the extent to which schools are complying with the Baker clause and promoting T-levels and apprenticeships as equally-desirable alternatives to A-levels.

**Principles – Quality**

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

**Response**

Our view is that a qualification's quality is best determined by its outcomes, including the measures listed in our response to question 19. Paragraph 55 provides a useful structural framework for a curriculum's validity but, with the exception of progression, the criteria do not guarantee good quality.

We appreciate that this is a first-stage consultation seeking to agree general principles but would suggest that, if the measures are to be linked to different levels of learning and

outcomes, then there should be a tiered approach. This would more accurately reflect the fact that technical/vocational routes from Level 2 to 3 are not as well established or linear as the A-level curriculum.

For example:

Stage 1 – a foundation in technical/vocational education with a Transition Year suitable for the many students who have had no, or very limited, technical/vocational education at school. Guided learning hours (GLH) should allow a broad introduction similar to the current study programme, and must include work experience, a technical/vocational element and foundation English and Maths, in order to provide a solid foundation for further learning.

Stage 2 – a competence-based qualification that equips students for entry-level employment in technical roles and/or progression into more advanced technical/vocational education. Students could progress straight into this level from Stage 1. This could be the place for current RQF Applied Generals, with emphasis on mastery of technical skill and readiness for meaningful industry placement. That flexibility would also suit students who are not yet ready to commit to a full T-level.

Stage 3 – full T-level (or equivalent Level 3 Applied General) that equips students with full occupational competence and entry into intermediate-level technical roles.

A tiered approach such as this sets the context in which the criteria listed in paragraph 55 can be used to assess the validity of a curriculum. We would recommend that the three-stage framework outlined above should take no less than four years, when studied full-time, and that funding on that basis should be guaranteed for all capable/eligible students.

Clearly there will be some funnelling, with flexibility for students of differing abilities and starting points. Critically, however, each tier must have a clear purpose and exit intention, with the progression timescale slightly extended. This is crucial to avoid the social mobility gap that a move straight from transition-level into T Levels could create, with many of the most disadvantaged students dropping out after Transition Year.

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

### **Response**

As stated previously, we have concerns that the measures listed in paragraph 55 are no guarantee of quality. A curriculum could offer a significant number of guided learning hours, but still not have good outcomes. Instead, we would urge the DfE to adopt a co-created and connected approach to quality that includes end assessment and employers' feedback.

Our European neighbours provide extensive – and compelling – evidence of the value in providing an education 'escalator' that is both dual-track (academic and technical/vocational) and 'step on, step off' with clear achievement points and associated qualifications at each exit point.

This is essential to addressing the UK's skills and productivity gap. As one of the UK's largest FE/HE providers – and one serving extremely disadvantaged students, many of who have poor prior attainment, low aspirations on entry and complex personal and family backgrounds – we cannot stress this too much.

Many of our students come to us with extremely low expectations of themselves and what they can achieve in life, linked to their previous experience, local community and upbringing.

For them, the 'quality' of their educational experience is linked to gaining meaningful employment and their confidence and aspirations are boosted with every achievement. Initially, they may start see themselves as part of a community and giving something back; then they begin to look at their longer-term career aspirations and personal development.

The quality measures need to value, reward and embed these learning achievements at each level of progression – it is crucial that they provide clear signposts of the real value of these qualifications to students and employers.

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

### **Response**

Adult learners typically have multiple competing agendas for their time and commitment. Many have been out of education for some time. They may have to combine their studies with caring responsibilities and employment. Quality principles must be cognisant of adult learners' needs and not create barriers for them. Flexibility is key, with the ability to deliver education in tiered stages that recognise a learner's starting point, can be taken at their own pace, and is accessible in a variety of modes (including blended/online).

The full-time, face-to-face approach proposed for T-levels will represent a major challenge for many adult learners. Yet the need for lifelong reskilling/upskilling – including people furthest from the job market – means they are precisely the audience who require accessible high-quality technical/vocational qualifications which will change their lives.

The recent boom in apprenticeship starts of all levels by learners aged over 25 indicates the real need for accessible options. As in our earlier answers, we maintain that a tiered approach with multiple 'step-on, step-off' points, with recognised qualifications at each stage, is the most beneficial to adult learners.

### **Applying our principles – Our broader ambitions**

**Q - At level 3, what purposes should qualifications other than T Levels or A Levels serve:**

**a) for 16 to 19 year olds? Please give reasons for your answer.**

**b) for adults? Please give reasons for your answer.**

We fully support the consultation's aim of clarifying and simplifying the qualifications system. We strongly believe, however, that there is enormous value in retaining alternative Level 3 qualifications. They have many clear purposes – and can be hugely beneficial – both for 16-19 and adult learners.

Some subject areas are not fully covered by T-levels or A-levels – for example, creative arts and sport – so it is vital that alternative Level 3 qualifications are retained. (It is not realistic to assume that apprenticeship-only routes will meet the needs of students, employers and the market.)

As stated in responses to previous questions, large numbers of students will take complex, non-linear routes into FE/HE and subsequent employment for very valid reasons including personal circumstances and prior achievements. The flexible nature of the current qualifications system benefits all learner types, many of whom cannot commit to doing a T-level or 3 A-levels, but who do aspire to progress into higher education in due course. Depriving them of 'step on, step off' alternatives to T-levels and A-levels – with partial attainment recognised at each level – would significantly damage their life opportunities and

further disadvantage those most in need. It would have a hugely negative impact on social mobility.

Approximately 52% of students in Greater Manchester currently leave school without 5 GCSEs from Grade 4-9. (Figures across England vary between 40% and 60%.) Most of these students have been failed by the school system for various reasons. In reality, much of the initial education and support they need post-16 is remedial in nature. They need qualifications that recognise this, provide them with a sense of achievement (perhaps after feeling like a failure throughout school), and get them motivated and engaged in further learning.

The current qualifications system enables FE colleges to put these building blocks in place with digital literacy, foundation English and Maths, PSE\* plans and work experience. This builds students' personal motivation, ambition and aspiration whilst nurturing responsible attitudes for employment and citizenship. These alternative qualifications serve distinct purposes and offer clear progression by putting the foundations in place for students to attain further qualifications and/or employment. It is important to retain qualifications that recognise students' achievements at each level.

*\*personal, social and employability plans*

**Q - How should we determine “overlap” in relation to:  
a) overlaps with T Levels? Please give reasons for your answer.**

We fully support the consultation's aim of clarifying the current system by removing duplicate qualifications. In relation to 'overlap', however, the picture is much less clear and we would urge extreme caution before withdrawing any qualifications. The consultation document recognises that one size does not fit all, and we would strongly argue for the retention of alternative Level 3 qualifications that cover similar subject matter to a T-level or A-level but have teaching and assessment styles that suit different kinds of learners. Similar to universities where programmes from similar subject areas can be taught with foundations as an Arts or Science subject; this enables different students with different learning styles and strengths to be accommodated within the broader T Levels framework.

Many of our learners access a combination of Level 3 qualifications that may include applied general, BTEC, A-level and personal/professional development. This flexibility offers the widest range and volume of students to progress. Rather than benefiting the most disadvantaged students by presenting them with clearer options, restricting the market to T-levels and A-levels will negatively impact on social mobility and personal progression. (This applies to students of all ages, not just adult learners and those with SEND.)

In addition, we have concerns that it is a retrograde step given strategic shifts in higher education. The percentage of students entering higher education with a blended range of Level 3 qualifications has risen significantly in the past 10 years, with even the most academic universities now recognising that A-levels are not the only indicator of a student's attainment level and future potential.

For the reasons stated earlier, we would have very serious concerns about any proposal to remove alternative Level 3 technical/vocational qualifications just because they may overlap with T-levels. Any withdrawal must be carefully considered against the wider policy agenda of creating better futures through education. Many students' progression is not linear and the scale and impact of any changes to existing qualifications – including the impact on learners' ability to progress – would need to be very carefully thought through.

**b) overlaps with A Levels? Please give reasons for your answer.**

We reiterate our previous response. In addition, we would add that they are also smart, practical standards which facilitate social mobility and overcome barriers to participation and industry placements. The current tiered approach provides bridges to higher learning levels.

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

**Response**

Flexibility, portability and choice are the best ways of ensuring more people progress. Learning outside the standard A Level and University routes is often not as linear, particularly among adults who typically have many more personal commitments to consider.

Our experiences, for example, following the introduction of adult learner loans in 2013/14, where student numbers fell in Greater Manchester by 2/3 in three years, highlights an ill-thought out policy which has damaged the regional economy through having far fewer Level 3+ qualified adults, just when the regional economy was growing and needed more higher skilled workers. It is a highly sensitive environment, particularly to changes in funding and choice.

The broader economy needs better qualified people across all sectors; the current ability to combine qualifications such as BTEC and Applied General standards is fundamental to facilitating progress. The growth in L3+ apprenticeships among adults over 25 is linked to adult learner loans and changes in levy and funding apprenticeships.

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

**Response**

As indicated above, maintaining levels of flexibility (with quality and funding criteria) that recognise the multiple starting and stepping off points. It is not the lack of commitment or academic ability that limits achieving at level 3 and above, it is balancing personal constraints and commitment.

Our experiences with learners at these levels, and in particular with adults, reinforces flexibility and the ability for learning to be at the pace of the learner, but to also be cognisant of personal needs, which are met by being able to use education in building blocks.

**Securing early progress**

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

**Response**

The long tail of education provision is intended to cover the wide range of curriculum and specialisms which are of meaning and relevance to the students, but also to employers. Specialist technical skills in say automotive where there is a plethora of specialisms that industry needs; the same also exists in the creative arts – many of these qualification appeal to students with specific needs, and enable each to engage in learning at a higher level – it is important that these are maintained.