

Review of Post-16 Qualifications

June 2019

About GuildHE

1. [GuildHE](#) is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports.

Consultation Questions

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

We believe that the best way to improve the clarity of qualifications to both young and mature learners is to offer more robust Information, Advice and Guidance. The loss of a coherent and well-funded careers service (both in individual schools and nationally) has added to the confusion of what career opportunities are available and what qualifications to undertake to access specific career paths.

Furthermore, we reject the premise that at age 16 a child must choose between taking academic or technical qualifications. Even with a fully resourced and well-evidenced careers guidance offer to young people, it forces them to make a decision which will affect their whole life and if these reforms go ahead as stated, will lock certain students into low skilled, low wage occupations and stifle social mobility. It is too early to suggest that the L4/5 review will enable students to progress to higher technical learning. There has been no official policy position about the way forward in this area or how it will be funded. We welcomed the Augar panel recommendations to extend the provision on L4/5, but the reality of this is that it very far away. There is still a great deal of tension between IfATE and the OfS in who should regulate this higher level provision which adds to the confusion over these qualifications. Without a clear higher technical offer, students forced to choose at L3 or below may be locked into their decisions at 16, with detrimental consequences.

We agree that the register of qualifications at L3 and below could be streamlined to help learners (and schools/colleges) navigate their options more effectively. The government should work with employers, HE and FE institutions and sector representative bodies to ascertain the current prestige of certain qualifications on the Ofqual register. It is not as easy as striking all qualifications from a certain awarding body off the register. Each sector will have their own

reasons for why a certain qualification is important in its current form, and DfE should start to gather this information before it makes final decisions on what to fund going forward.

We would also like to take this opportunity to argue against the assumption within the whole of this consultation that there are only two types of qualification: academic and technical and that only academic leads to further higher learning and only technical leads to a job/further technical education. Universities have been offering technical education for a very long time. Many of our members proudly technical and professional higher education and accept 'technical' qualifications as prerequisites for learning. Many technical qualifications are a blend of theoretical learning (why something is the way it is) and the skill to practically do it. It is disingenuous to suggest that technical education does not include 'academic' content and vice versa. Critical thinking and reasoning is a core skill for many technical professions, removing this emphasis from technical qualifications such as T Levels could negatively impact on the usefulness of the qualification in the workplace.

2. Are standalone qualifications in personal, social and employability skills necessary?

Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.

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

DfE should be very careful when it reviews qualifications with the aim to assess whether they "support progression to successful outcomes – to higher levels of study or a meaningful job". Not all qualifications will directly lead to these outcomes but will be an important stepping stone for a future career. This is especially true with qualifications related to craft.

Applied Generals have become an important qualification for entry to further study and training in many professions. They also offer a great way of young people who are both practically minded and academic to undertake a blended qualification that leads to a good outcome of further study or employment. In specialist arts institutions in particular, BTECs offer a good balance of practical making and art theory that provide a strong foundation for university study. With GCSE and A Levels in Arts subjects in steep decline, and with the T Level being impractical to deliver in many locations because of the work experience requirement, BTECs may be the only option to undertake an arts qualification going forward.

When looking at the data which shows the academic success of those who hold AG's it is, therefore vital analysis looks at both where that learner has come from (school type and location) and the type of course and institution in which they secured a university place as there are many success stories in vocationally rooted HE courses from BTEC holders, which may be at odds with

BTEC holders studying more academic subjects at certain types of university. We know from school and college data more broadly that type of school, social background and region are important markers to measure student success. The success of a certain type of qualifications should not be measured in isolation of these other factors.

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

We would not like this part of the education sector to make the same mistakes as in HE to monitor student outcomes. Showing the impact of qualifications should look at both career trajectory and salary - and should recognise that different industries work at different paces and to different normative behaviours. The agricultural industry, for example, needs many skilled workers, but due to commercial pressures to keep costs down from supermarkets, have much lower wages compared to other industries. Similarly, it could take 10 years for someone wanting to work in the creative industries to gain the right (and varied) experience to secure a permanent contract, or may never due to the nature of the industry.

If Government believes that their new T Levels should directly lead to positive employment outcomes and are crafted with specific employment outcomes in mind, then they must be measured on whether that learner entered the specific profession as a measure of success. This is also true of Apprenticeships. Academic qualifications (including applied generals) are different as their aim is not directly for specific employment, but to enable learners to develop their knowledge and understanding of certain areas for either employment or further education. They cannot be measured using the same success markers as T Levels as they are designed for different purposes.

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

We agree that the current quality markers as described in para 55 of the consultation are the right markers for being accepted as publically fundable qualifications. We do not agree that employer engagement in the design of qualifications will always lead to good outcomes for students. It is enough for employers to endorse qualifications. DfE should reflect on the experiences of IfATE and the current trailblazer process that have shown how complicated and ill equipped many employers are in engaging in qualification design. They are not educational specialists, and larger employers may have very different priorities to smaller employers. The lack of agreed standards to date and the time they have been taking to negotiate apprenticeship standards should show DfE just how bad employers can be at engaging in qualification design. Many sectors just don't have the capacity or experience of engaging in this way. If DfE wants to see more employer

engagement, they must offer support for industries to do so and work with industry representative bodies to find bespoke solutions, rather than imposing a single process.

There is no mention in this list of whether the qualifications are of specific importance in delivering the industrial strategy. We don't think all qualification should meet this criterion - but it would be helpful to acknowledge that some Applied Generals are of specific importance to the industrial strategy.

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

Qualification content, the assessment tasks and the quality assurance of the qualification should be the most important priorities. These are what give the qualification prestige and trust to both learners (of all ages) and employers.

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

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

We fundamentally disagree that all funding should be removed for all but A levels and T levels for 16-19 year olds. Whilst the idea of integrating mandatory work experience into T levels is partially fulfilling the learning of skills, this requirement will prohibit certain schools and colleges in many parts of the UK from offering the types of technical qualifications young people may wish to obtain. This will have a severely detrimental effect on social mobility, especially in rural and coastal locations. There must therefore be alternative qualifications, such as the well respected BTEC, that allows learners to study a broad range of technical subjects anywhere in the UK.

Furthermore, Higher Education providers find technical BTEC qualifications to be a good balance of theoretical and practical studies that adequately prepare learners if they wish to progress onto higher level programmes (including standalone Level 4 and 5 qualifications) as well as directly into employment. We note Government has shown little intention in ensuring T levels are developed with progression onto L4+ qualifications in mind, which will further stifle social mobility and cut off access to these learners wanting to undertake a high-quality L4 qualification in the future. Having no HE experts on T Level panels will undoubtedly ensure that these qualifications will not be fit for progression onto L4+ courses.

There are also an assortment of high quality post-16 qualifications that offer specific industry leading training. It is unclear how 16 year olds in college could access these types of qualifications under these proposals, instead being forced to undertake more generic T Levels, or worse (in locations where it is impossible to deliver a T Level in their area) having to move far

away from their families or defer their training until the age of 18. Specific examples here are in dance, computer science, retail business, graphic design, creative production, performing arts, art and design, healthcare, design and technology where the current BTEC offering is high quality and industry supported.

We, therefore, believe it would be a grave error to remove the funding for all post-16 courses that are not an A or a T level. This will have severe consequences for social mobility and aspiration raising, creating further problems for diversifying certain sectors and industries.

b) for adults? Please give reasons for your answer

T Levels will not be an accessible qualification for adults to engage with if they are already in employment and wish to re-train and goes against the principles outlined in the Post-18 Funding review that education providers should offer more flexible study/qualifications options. At the same time, we should also not be endorsing specific qualifications for specific ages. Applied generals offer a good quality learning experience for both adults and young people. Removing this option for young people could undermine the prestige of applied generals as they will be seen as an add on and less rigorous qualification just because it will not be universally delivered. If resources are diverted away from universal delivery of these courses, then fewer colleges will be equipt to deliver these to adult learners and may lead to less accessibility.

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

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

T Levels are designed to offer general skills and knowledge for a wide range of professions within an industry. In contrast, Applied Generals offer more specific skills and knowledge for a narrower list of occupations. But overlap should not just be judged on the content of the programmes. If the T level is unable to be delivered in a specific location (due to the work experience element for example) then similar Applied Generals should be allowed to be offered in their place to young people. Adults should always have access to Applied Generals to account for their need for more specific training.

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

We don't believe in the most part there is any overlap between A Levels and Applied Generals.

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

Firstly as we have already suggested, there should be much more funding and support available to offer good quality and well-informed careers advice and guidance. In our view, this is a fundamental reason as to why there is less diversity in what school leavers choose to do next.

Secondly, the development of qualifications at L3+ should be developed with that transition in mind. At present, Level 3+ qualifications are developed as stand-alone, with no parity of themes between key skills and competencies. Many trailblazers have not considered prior learning in the design of apprenticeships and what qualifications may be available after the completion of the apprenticeship. In HE we have a strong history of designing levels of qualifications that directly lead on to further learning. Whether that be Foundation degrees, HN's or Masters, PhDs or PostDocs, a principle of design of our qualifications reflects the learning that has come before and what future learning may be undertaken. This holistic approach is needed in the technical education space in order to more easily articulate to learners, parents and employers what qualifications may lead to next.

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

see above.

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

We don't believe that all L2 qualifications should have the sole outcome of leading to direct employment, for all the reasons cited in our response to this consultation. A step by step approach to designing a holistic qualifications offer would mean that a L2 qualification should also lead to an aligned L3 as a positive outcome.

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

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

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

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

Yes - although it would be useful for the ESFA/OFQUAL to keep a record of these qualifications on their records if it becomes a necessity for a specific profession with a skills shortage to deliver

them. Keeping a record should speed up the process instead of needing to apply to design and approve the qualification again.

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

DfE should work with industry representative bodies to ask this of individual sectors. Some sectors will recruit in cycles and use these qualifications to upskill workers on a less frequent basis.

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

No. some smaller sectors could potentially suffer a skills shortage if a small number cap is applied. this has already happened in the case of apprenticeships where whole industries are unable to have standards approved because of small numbers. cutting off funding through this route too could be additionally detrimental.

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

See our response to Q18.

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

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

If Government wishes to re-align technical qualifications to the needs of employers, then more should be done to involve employers, specialist education providers, and educational institutions who have developed relationships with employers to work with you on getting this right. Notwithstanding that, much more could be done to engage higher education providers in understanding what impact these changes may have for future social mobility and progression onto higher programmes. At present, HE has been sidelined in major decisions about technical education - and with many of our members offering technical higher level qualifications, this could have expensive repercussions for the student needing to undertake top-up/bridging qualifications in order to access further training. We wish to mitigate this risk as much as possible and have a moral obligation to ensure that learners (especially those at age 16) do not lock themselves into one path for the rest of their lives without opportunities to re-train or grow their skills and

competencies. There is a real danger that these reforms will further exacerbate social inequalities.

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6th June 2019