

Inquiry into the future of post-16 qualifications

Introduction

The Association of School and College Leaders (ASCL) represents over 21,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

ASCL welcomes the opportunity to contribute to this inquiry. We have structured our responses around the headings in the “Call for evidence”. In addition to the responses below we would urge the inquiry to consider ASCL’s published works on [“The forgotten Third”](#) and its recent [“Blueprint for a Fairer Education System”](#). We believe both of these bodies of work provide significant input to any conversation around what a post-16 education system should look like.

The experience to date of those taking or delivering T Levels, and any changes to T Levels that may be needed to ensure they are accessible to all students.

1. Our members are responsible for delivering the new T Levels qualifications and most are reasonably pleased with their start, notwithstanding lower than expected enrolment numbers. It is not clear whether these lower numbers are all entirely down to Covid-related factors e.g. a lack of opportunity to promote T Levels via open evenings, careers events, visits to feeder schools etc, as well as the lack of industrial placements from employers. It may be that lower enrolments are also due to inherent faults within the rollout of T Levels – the main factors being:
 - a. The notable number of regional “coldspots” where local employers are not available so the qualification just cannot be offered.
 - b. The extent to which the qualification is an “all-or-nothing” route lasting two years, meaning students cannot change their options if it proves to be too challenging or is not what the student anticipated. This is a very “brave” decision for a young person to have to make aged just 15 or 16.
 - c. The transition programme from level 2 to T levels is new and largely unknown by parents and young people. T levels at level 3 are a big step up for those on level 2 programmes and this does not assist in increasing the enrolment numbers on T levels.
 - d. The additional hours within the qualification are often off-putting to some students, especially where they need to maintain a part-time job or have carer responsibilities at home.
 - e. The reluctance of many universities to accept T Levels, especially those in the Russell Group.
 - f. The problems that schools and colleges have in attracting suitably qualified staff with industry standard skills, especially when school/college resources cannot stretch to match the industry salary levels that these staff could otherwise attract.

The strengths and weaknesses of the current system of post-16 qualifications, with reference to A Levels, T Levels, BTECs and apprenticeships, in preparing young people for work or further and higher education.

2. The major problem with the present post-16 system is its lack of funding. We acknowledge the recent increase of approximately 8% in the core funding rate, but this will be swallowed up by a corresponding required increase in teaching hours of 7% per programme, as well as the highest inflation rates for some time. Funding the present post-16 system adequately should be the foundation stone upon which to introduce reforms to the system. The increase in funding rate for high cost (STEM) programmes is welcome but many programmes very successfully preparing young people for apprenticeships and work in their locations do not attract this increase in funding and yet are very successful in what they do, albeit very costly to run.
3. Notwithstanding the funding point above, we do share the government's ambition to create a world class post-16 education system, comprising both technical and academic routes, that helps all students to fulfil their potential and meets the needs of employers. We therefore welcome the introduction of T levels and many colleges and schools have already started to deliver these stretching new qualifications.
4. However, the introduction of T Levels should not be at the expense of BTECs and other AGQs. This is a fundamental flaw in the proposed system which will mean an otherwise promising qualification such as the T Level, will get categorised negatively, building resentment in schools and colleges and will not attract the positive support it needs to survive and thrive. Running T Levels alongside BTECs and AGQs is a simple and obvious way to avoid this outcome. It also means that in those sectors where T levels do not provide the route to qualification for local industry, there are still options for learners to study and work locally.
5. Maintaining A levels is a sensible policy. However, we believe that the removal of the AS level, taken after the first year of A level study (usually referred to as year 12), was a significant mistake, which meant that students generally reduced their programme to three as opposed to four A levels. It has also led to a higher drop-out at the end of year 12, as students are unable to drop their least favourite subject and carry on with three others. The removal of AS levels has also made it more difficult for students to mix academic and vocational courses into one programme to suit their particular needs and career aspirations.

The benefits and challenges the Government's proposed changes to Level 3 qualifications would bring, with reference to any implications for BTECs and routes into apprenticeships.

6. The main proposal of the Department for Education's review of post-16 qualifications at Level 3 in England is to introduce a binary system of T levels and A levels at Level three, where the vast majority of young people pursue one of these qualifications at the age of 16. We are deeply concerned that, as a result, funding will be removed for the majority of applied general qualifications such as BTECs. We believe that AGQs have a vital role to play in the future qualifications landscape and that the present deferral of the defunding timeline by one year does nothing to alleviate our longer-term concerns.
7. What is particularly baffling about this proposal is that many of the applied general qualifications are newly-reformed and of high quality and enable direct progression into apprenticeships. Not giving them time to bed into the system, removing them as routes to apprenticeships and evaluate them seems short-sighted and incoherent.

8. For many young people, AGQs (taken alongside A levels or as part of a standalone study programme) will be a more appropriate route to support progression to higher levels of study, an apprenticeship or higher apprenticeship or a meaningful job, than an A level or T level-only study programme.
9. Although some AGQs are available in similar subjects to T Levels, they are a different type of qualification that provide a different type of educational experience – one that combines the development of well established, industry endorsed, vocational and practical skills with academic learning.
10. Defunding AGQs will leave many students without a viable pathway at the age of 16 and will hamper progress to higher education, apprenticeships and higher apprenticeships or skilled employment.
11. The present implementation timeline is not feasible, particularly given the unfolding impact of the Covid pandemic. Funding should not be removed for any applied general qualification unless an impartial, evidence-based assessment has concluded that it is not valued by students or employers. The pandemic has greatly hampered the opportunity for young people and adults to progress into apprenticeships and the proposed changes to level 3 provision, with the proposed removal of many AGQs will challenge the previous opportunities and routes into apprenticeships even more.

The extent to which the Government’s review of level 3 qualifications will impact disadvantaged groups, students from minority ethnic backgrounds, students known to the care system, and students with special educational needs or disabilities, and what measures might be put in place to mitigate any negative impacts.

12. The Department for Education’s own impact assessment in the original level 3 Review has already concluded that students from disadvantaged backgrounds have the most to lose if AGQs are defunded. These students are often from particular minority ethnic backgrounds who use the vehicle of the AGQ to proceed to university. This admission by the Department for Education is a very damning indictment of their own proposals and this has not been addressed since the publication of the report.
13. It is also clear from present enrolment patterns that T Levels do not offer a viable option for many students with learning difficulties or EHCPs. This is mainly down to the inability or unwillingness of employers to offer extended industrial placements (due to the additional effort and resources involved on their part). This presents a particularly worrying landscape if AGQs are then removed, which are often proving very successful for students from disadvantaged groups or with SLDD.
14. Seeking responses to the types of measures that may be put in place to “mitigate negative impacts” is a galling question to ASCL. The answer is simply not to remove the AGQ in the first place and then any negative impacts are instantly removed.

The benefits and disadvantages of introducing a baccalaureate system in post-16 education that allows students to take a variety of subjects, including both academic and vocational options.

15. The introduction of a baccalaureate system is a huge issue, at least on par with the introduction of T Levels. It should be the subject of a separate consultation, as it has been in the past with the years of consultation of the Tomlinson Review, even though the recommendations were not implemented in the end.

16. However the findings of the Tomlinson Review are, in the main, still applicable today (we should remember that Tomlinson himself envisaged that the introduction of a baccalaureate would take at least 10 years to implement. In general terms ASCL would be in favour of an overhaul of the 14-19 phase of secondary education, and a review of where GCSEs at the age of 16 fits in to this, although it must be stressed that this is an issue that would need widespread formal consultation with ASCL members before we formally endorse any position.
17. Again in broad terms ASCL would be in favour of considering a baccalaureate type award at 18 for all pupils. The assessment system is too heavily weighted in favour of GCSEs and A Levels as was witnessed by the difficulties that the system faced when exams were abandoned because of COVID. The present assessment system projects a view that nothing else matters to a young person's development, well-being or their ability to contribute to society in later life.
18. A baccalaureate qualification should value so much more than just external exam results. It could encompass, for example, artistic endeavour, sporting prowess, participation in civic society and include the EPQ, instrumental music grades, other arts and sports awards and accredited schemes such as the Duke of Edinburgh Award or the National Citizen Service.
19. An overarching award which includes *all* achievement would also eradicate the unnecessary, status -ridden distinction between academic and vocational pathways which has blighted the English education system for decades. Not all students would achieve to the same level, but everyone could complete the award whether in schools, sixth form and FE colleges or even apprenticeship programmes. It would act as a portfolio of achievement and a passport to the next stage of education or training, without the demoralising language of pass or fail, vocational versus academic.
20. ASCL has contributed much to the debate about "the forgotten third" of young people at the age of 16. Our position is centred on the unfairness and incongruity of a system that gives young people the opportunity to fail, but, for a third of them, no opportunity to "pass" (because of the process of "comparable outcomes" in the grading). ASCL believes it is not right that in the 21st century there are so many students moving into the post-16 phase officially branded as failures.
21. We also believe that a baccalaureate type system would allow more breadth for students, which we believe to be highly beneficial, e.g. allowing more students to take a foreign language.

The benefits and disadvantages of a post-qualifications admission system.

22. On balance ASCL would like to see a change to the present model because of the problems that exist around unconditional offers, "reduced if firm offers", the "offer high, accept low" policy, the inaccuracies of predicted grades, the lack of transparency around university *actual* entry grades and the way that personal statements can disadvantage those students who do not have appropriate support to complete them.

23. However, we do urge caution for a proposed move from a system with known problems (which should have been solved already without a move to PQA) to unknown problems which may widen the disadvantage (or privilege) gap.
24. In the recent consultation the government referred to two models, Model 1 (“Post-qualification applications and offers”) and Model 2 (“Pre-qualification applications with post-qualification offers and decisions”). We are not in favour of Model 1 because it does not allow for students to be supported appropriately by schools and colleges (especially for the more disadvantaged students who need it the most).
25. ASCL does not see any feasible ways to facilitate a Model 1 PQA process starting at the end of July. In addition, we would be very concerned about the likely loss of teaching and learning time necessary to start examinations earlier. This is likely to disadvantage the most vulnerable students the greatest, who need teacher contact for as long as possible. It also cuts short the education of those who may not be continuing to HE (who need as long a Year 13 as possible).
26. Another major problem with Model 1 is that students who have finished Year 13 have physically and psychologically left secondary education. Many, especially the more vulnerable and those with summer jobs, are unlikely to spend much time in school or college to submit HE applications, even if teachers are there. The process might continue into September but by then, the school or college should be concentrating on starting the year off for the new Year 12s and Year 13s, rather than on those who have left. Therefore, funding would be needed to provide careers advisors dedicated to this PQA group from late July to late September (and even then, it may be difficult to source such “temporary” experts). There is a very real shortage of high quality advice at the moment and those working in the state sector typically have a huge caseload over an extended period.
27. Model 2 has a number of potential benefits, e.g. by reducing “undermatching” through raising aspiration levels of the HE choices for the most disadvantaged students (although ASCL does have some reservations about the focus on higher tariff universities necessarily being “better”); less focus on predicted grades (which can cause considerable angst as well as being very time consuming for teaching staff in schools and colleges) and potentially removing the need for personal statements (which are also very time-consuming, of dubious benefit in many cases and can often be more advantageous to those students who receive the most support).
28. Our members are however somewhat split between Model 2 and the well-publicised model proposed by UCAS (where rejections are allowed). The UCAS model would prevent students putting in “wasteful” choices, but ASCL is not fully convinced that universities would always be transparent about their reasons for rejection, possibly keeping quiet about rejections until results are out.
29. There has been some in favour of a system in which post-qualification applications and offers take place from August onwards with no changes to Level 3 results dates, but with HE terms starting anytime between November and January. We have ruled out specifically considering this as a potential delivery model for the following reasons:
 - a. The considerable gap between the end of school/college and the start of university could pose a challenge to students, particularly for those from disadvantaged backgrounds. There is a risk that these students would have no source of income during this period and then do not progress into HE.

- b. Starting the academic year in November would create a very short first term prior to the Christmas break, whilst running an academic year from January to October would be out of sync with most European nations, and many non-European countries, including those from which many international students currently enrol.
- c. As the exam/result timetable in other northern hemisphere countries usually means that students receive their results in the summer, it could have implications for where international students choose to study.
- d. This model could involve a considerable loss of income for higher education providers in the transitional year (up to three months' worth of tuition fee and accommodation revenue).

30. ASCL believes then, that on balance, Model 2 would be better than the present system. However, it should be noted that many of our members also believe that the present system could be the best solution of all - if the flaws mentioned at the start of this section were addressed.

Conclusion

I hope that this response is of value to your inquiry. ASCL is willing to be further consulted and to assist in any way that it can.

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