Review of post-16 qualifications at level 3 and below in England

Response of the Association of School and College Leaders

Introduction

1. The Association of School and College Leaders (ASCL) represents over 19,000 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.

2. This consultation response also incorporates the views of the Principals Professional Council (PPC) members. PPC joined forces with ASCL in 2014 and will operate as part of ASCL FE from September 2019. PPC represents principals and senior leaders in Further Education Colleges. All Further Education Providers offer post 16 qualifications and most also offer post 18 and higher-level provision, including Professional Training courses and Higher Education.

Response to questions

Section 1: Principles – Purpose and necessity

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.

3. We welcome any move to further clarify the purpose of qualifications at level 3 and below. However, it is important to note that the clarity and purpose of most qualifications is not in question. These are set out clearly by the Awarding Bodies in their specifications, which are available to students and their providers.

4. Schools and colleges make parents and students aware of the purpose and progression routes of different qualifications in careers meetings, at open days and in their published prospectuses. Employers also make clear their preference for certain qualifications. It is incorrect to assume that there is a fundamental problem with the clarity and purpose of most qualifications.

5. In addition, a student's 'intended outcome' is not always a simple binary choice between progressing on to employment or further study. Many students at the age of 16 do not yet know their intended post-18 career or learning path. Qualifications such as Applied General Qualifcations (AGQs) and the International Baccalaureate Career-related Programme (IBCP) provide successful and engaging learning routes, offering students the 'best of both worlds'. They can then decide whether an academic or technical route is more appropriate for them post-18.

6. This is particularly the case where students take a 'mixed economy' of AGQs and A levels. Removing this opportunity and forcing students down a path of either A levels or T levels at

age 16 does not give a greater guarantee of progress towards a student's 'intended outcome'. On the contrary, our view is that this risks leading to more students dropping out of education altogether.

7. Adopting a middle ground of an applied route that sits between academic and technical routes is, in our view, likely to result in better outcomes for the cohort at level 3 than presenting all students with a binary choice between an academic or a technical route.

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.

8. It is highly beneficial to learners to retain a range of qualifications designed to give broader personal, social or employability skills. This is particularly the case at level 1 and entry level, where they form the majority of qualifications undertaken. We would want to see such qualifications remain as standalone qualifications at these levels.

9. At levels 2 and 3, where such qualifications form a much smaller proportion of overall available qualifications, we would want to see an analysis of the progression routes of students before we supported a decision to stop maintaining them as standalone qualifications.

10. It is very difficult to argue that these skills can be adequately taught through broader study, rather than as standalone qualifications, given the severe cuts in recent years to 16-19 funding. Unfortunately, but perhaps understandably, these are the areas that schools and colleges tend to sacrifice first in order to concentrate on teaching core qualifications.

11. Adults who do not achieve strong Year 11 or post-16 qualifications and experience whilst in education may lack the necessary personal, social and work skills required to succeed in the workplace. It is, therefore, important that they can access standalone programmes to help them develop these skills at a later stage.

Section 2: Principles – Progression

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?

12. We agree that, as well as having a clear purpose or intended outcome, qualifications should also be necessary. In other words, the knowledge and skills developed through undertaking the qualification should be in demand by either employers or students themselves.

13. The second of these two stakeholders is just as important as the first. The only criterion for determining a successful outcome should not be to meet the needs of the employers or the Further/HE institutions to which students will most likely progress. Neither should future wage earnings be the only important criterion. Sometimes students choose qualifications that they enjoy studying, find fulfilling, and are important to their self-esteem or mental health. Being happy and successful in studying a qualification is an important consideration – providing these qualifications are part of an appropriate study programme that is developing that young person and leading them to the next phase of their life – even if it means relatively lower wage earnings.

14. In terms of determining which current qualifications are delivering successful outcomes, we would like to see more evidence of where students have taken mixed programmes at level

3 (i.e. programmes including both A levels and AGQs). In addition, there needs to be more evidence about whether the size of the qualification results in differing success rates. Just supplying evidence from types of qualifications without this type of more detailed analysis is not sufficient.

15. The evidence behind the assertion that students entering HE with AGQs are more likely to drop out is based on the old Qualifications and Credit Framework (QCF). We need to see the impact of the new Regulated Qualifications Framework (RQF) before any similar conclusions can be drawn about dropout rates. It may also be the case that this 'evidence' reflects a failure of HE institutions to adjust their provision to provide more relevant and tailored support for these students, particularly for students from poorer or some black and minority ethnic (BAME) backgrounds.

16. The data collected by providers (the Individualised Learner Record) is probably sufficient to see successful outcomes at college provider level. However, data at DfE and Awarding Body level could provide more regional and country-wide information about the progression routes of young people and adults who have taken these programmes.

17. In terms of monitoring and assessing the success of future qualifications, both the Education and Skills Funding Agency (ESFA) and Awarding Bodies could collectively provide and publish useful regional and nationwide data on trends around numbers, skill levels and location of those with skills in different disciplines who have undertaken different qualifications.

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

18. Data about student outcomes could be used in a number of ways to provide labour market information about the number of people with certain qualifications available at local, regional and national levels to meet employer skills needs. This would help employers looking for skilled people in a particular location and those employers seeking to locate in places where skilled labour already exists.

19. As mentioned previously, it is too narrow to just rely on future wage earnings for assessing the success of qualifications. Some students choose to enter lower paying occupations in highly worthwhile sectors such as charities, environmental agencies, caring, etc. It would be bizarre to consider such outcomes 'unsuccessful'.

20. Measuring the effectiveness of HE outcomes as a measure of assessing the success of the qualifications on entry must also be treated carefully. A more holistic picture must be taken which includes the quality of the HE provision, the support given to students whilst studying and the pressure on young people from admission staff through practices such as unconditional offers, which may mean students end up on inappropriate courses at HE.

Section 3: Principles – Quality

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.

21. We consider the following features to be broadly the right starting point: declared purpose, recognition, content, assessment, *some* employer involvement in technical qualifications (including provision of work experience for the AGQs) and progression. We are less sure that the minimum size of guided learning hours (GLH) and grading are necessarily required. GLH used to be referred to as a 'qualification characteristic', and qualifications can be small but highly respected. Similarly, simple grading at pass/fail can also be perfectly adequate.

22. We would also like to see consideration given to the more subjective features of student enjoyment, happiness, mental health and wellbeing whilst undertaking a qualification. We accept that it is not easy to design a set of metrics for these areas, but they are extremely important, especially given the continued rise in mental health concerns among young people.

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.

23. It is important to recognise that, for some sectors, the success rate of a particular entry qualification for that industry may be intentionally low as the sector limits the number of people entering the profession.

24. In terms of the size of a qualification, we do not agree that some qualifications should be funded more generously than others within the same age group, e.g. T levels compared to existing 16-19 study programmes. All programmes, not just T levels, should aim to match the longer hours seen in similar programmes internationally. Imbalanced funding creates perverse incentives for institutions to adopt certain qualifications. Conversely, this can prevent students enrolling on the longer programmes such as T levels because they have part-time jobs or carer responsibilities.

25. Parity of esteem across qualifications should mean all 16-19 study programmes are treated equally. If some qualifications, such as T levels, need more funding for course materials or capital equipment then this should be done through appropriate cost weighting factors built into the funding formula.

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

26. The quality principles that should be considered for adults are generally the same as those for younger people. However, there are some important additional principles for adults, such as allowing for appropriate prior learning or experience, more flexibility in attendance and a unitized structure where practical.

Section 4: Applying our principles – Our broader ambitions

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.

27. We agree that, at level 3, qualifications should be designed to prepare students for further study, to enter skilled employment, or to support career progression – as well as to further their own personal interest and enjoyment.

28. However, we are of the strong opinion that there should be a third route between the academic (A levels) and the technical (T levels), i.e. an 'applied' route. This is essential for students who are undecided, at the age of 16, as to whether academic or technical is more suited for them.

29. Students on this route would study a combination of both academic and technical subjects This would include a variety of assessment methodologies including practical, project or external exams. The RQF AGQs are examples of this route and should be allowed to develop, with their effectiveness over time monitored.

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

30. For adults, the purpose of qualifications other than A levels or T levels is often the same as for 16-18 year-olds. In addition, adults often bring existing experience and learning which cover some of the features of an A level or T level programme, and therefore benefit from an alternative route which recognises and accredits prior learning.

31. Adults are likely to be clearer, on the whole, about whether they want to take practical or academic qualifications. However, some will want the opportunity to take smaller 'taster' qualifications that will help them decide on a future career path. An appropriately tailored applied route would help them to decide which academic or technical qualifications to go on to study at level 3.

How should we determine 'overlap' in relation to:
a) overlaps with T Levels? Please give reasons for your answer.
b) overlaps with A Levels? Please give reasons for your answer.

32. We agree that it may be unnecessary to fund qualifications that overlap with a similar qualification in another route. However, we believe that this should relate to qualifications which overlap in one of the three routes we propose above, rather than the two routes proposed in this consultation.

33. The determination of overlap cannot be answered in general terms, but needs to be considered on an individual subject basis. This can only be done after all qualifications have been initially allocated to one of the three routes.

34. It should be remembered that there is already an accepted overlap in some A levels, most notably the mathematical content in science, physics and maths A levels.

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

35. More students are able to move directly to level 3 after key stage 4 when there is a greater choice of routes. Only having two level 3 routes available, technical and academic, would mean that fewer students were able to access level 3. Three routes, to include an applied route, would enable more people to progress as there would be greater choice with a greater variety of entry requirements.

36. AGQs and other vocational level 3 qualifications have a history of offering many students with slightly lower GCSE grades the opportunity to access level 3. Withdrawing this option would, in our view, lead to fewer young people progressing to level 3 as they would have no suitable programme of study available (notwithstanding the impact of the as yet unknown transition year programme).

37. It is vital to support people to progress to L3 after KS4, through appropriate transition programmes. If students have not yet achieved a sufficient level 2 attainment, they will need further study to be able to cope at level 3. In addition, for some industries, the vocational skills needed to progress are found at levels 1 or 2 and therefore an individual may not be able to progress directly into a level 3 until they have achieved the required skills at levels 1 and 2. Examples of this include Catering and Construction.

38. Better funding for careers education, information and guidance (CEIAG) in schools would also enable more young people to progress directly to level 3. The lack of funding for careers education in schools means that young people may take the wrong option at level 3, and fail or drop out. Better funding for careers education in schools would, in our view, reduce the number of young people starting level 3 study again, and therefore taking three years, rather than two, to achieve a qualification.

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

39. Again, more people can succeed when there is more variety in the type of programme and type of assessment. Some learners respond better to linear, some to more practical and some to a mixture of both. The proposal for just two routes would mean students who respond well to a mixture of exams and coursework, may achieve less. A third applied route, with a mix of assessment methodologies, would mean more overall achievement and progress at level 3.

40. As per the previous response, many people also need stepped support though appropriate transition programmes to reach and achieve at level 3.

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.

41. ASCL supports the idea of a level 2 transition programme that includes diagnostic information, CEIAG, English and mathematics, work experience and work-related study, technical skills and pastoral support. The framework for this programme would be set nationally, with flexibility for providers to use this as a starting point for a tailored package to suit local needs and contexts.

42. We already have many meaningful examples of level 2 qualifications leading directly to employment. However, in terms of quality principles, many level 2 qualifications tend to include less formal examination and more skills testing than at level 3. This is appropriate for employment skills at level 2 such as hairdressing, construction skills and adult social care.

43. The most important quality principle is probably that a qualification is recognised by employers and that they support the qualifications through work experience and/or work placements. There also needs to be clarity about why students would choose these qualifications rather than opt for an apprenticeship.

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

44. We agree that qualifications at level 1 and below need to cover a variety of roles: delivering technical skills, supporting literacy and numeracy, covering broader personal, social or employability skills and supporting students with SEND (who form the majority – 64% – of students undertaking level 1 qualifications at Key Stage 4). They also often play a wider role in motivating and engaging students and improving wellbeing.

45. The relationship of these programmes with traineeships needs to be clarified, as does the role of local employers, charities or volunteer groups providing work experience.

46. 'Straightjacketing' students into taking certain qualifications just because they are the only funded options on offer is entirely inappropriate. We therefore welcome the recognition by the government that progression at this level is not exclusively marked by a qualification, and that it is vital that providers retain the flexibility to design programmes that are tailored to the individual student and their needs.

47. Level 1 qualifications also often provide the essential foundations for higher level learning, and may be central to technician level roles. Qualifications at level 1 therefore can play a central role in the development of occupational skills in the future.

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.

48. ASCL does not believe there are any further principles to add to our previous responses.

Section 5: Securing early progress

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.

49. ASCL is not aware of any additional equality impacts to add to those mentioned in the equality impact assessment published alongside this consultation.

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

50. In broad terms, ASCL agrees with the proposed criteria for withdrawing funding approval for those qualifications that have been approved and available for at least two years but have had no publicly funded enrolments. Caution should be applied, however, in cases where qualifications may be currently under-used, but may still be relevant to the skills development requirements of the occupational sector in the future.

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

51. Some qualifications with traditionally very small enrolments may serve a valuable purpose – examples that are often quoted are traditional trades such as a farrier, saddle-maker, blacksmith or cooper. In some cases, these courses rely on a very small number of suitably qualified staff to deliver them – sometimes a single individual. If these staff are ill, on sabbatical, etc. then there may be no enrolments during a particular period. In exceptional cases such as these the qualifications should remain approved for funding.

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

52. In general terms we agree with the principle of withdrawing funding from qualifications with low enrolments, and the figure of 100 enrolments seems a reasonable place to start. However, as the consultation itself notes, niche qualifications with low enrolments (such as those mentioned in our response to the previous question) need to be considered on a case by case basis, with an appropriate local impact assessment.

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

53. See responses to the two previous questions.

Section 6: Shaping the next stages of the review

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.

54. ASCL is concerned that the withdrawal of funding for AGQs could have a disproportionate impact on students receiving SEND support (13% of AGQ students receive SEND support, compared to 4% for A level).

55. We are similarly concerned about the impact on some BAME students, who also represent a disproportionate percentage of the AGQ cohort.

56. The initial equalities and general impact assessment states that 'within the protected groups (such as those with special educational needs and disabilities (SEND) and those from BAME groups), our general expectation is that students will benefit'. We do not see any supporting evidence for this in the consultation or accompanying documents.

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.

57. In the accompanying document *Post-16 level 3 and below case for change*, there are references to the 2018 Ofqual analysis of students with prior BTEC qualifications. This mentions that their prior attainment is significantly different to the A level cohort (61% of AGQ students had 5+ A*-C GCSEs compared to 96% of A level students). There is no evidence that these students would be accepted to take T levels in the future. If AGQs were not available, there needs to be an impact assessment undertaken as to what would happen to these students.

58. Consideration must also be given to the impact of these changes on the thousands of people who have undertaken qualifications that may now be considered worthless, or no longer understood over time by employers.

Conclusion

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

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