

## **Government call for evidence on Post-16 level 2 and below study and qualifications in England**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

1. 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 and further education phase. This places the Association in a strong position to consider the work of the consultation from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to respond to the consultation. We are aware that many of the organisations and agencies with which we work will have replied separately. This response is an attempt to consolidate the views of our members who work in the post-16 sector.
3. We note that the consultation builds on an earlier consultation on programmes for 16-19 year-olds at level 2 and below.
4. The review of level 2 qualifications and below is important given the consultation on reforms for level 3 and the emphasis placed on the importance of progression from level 2 to level 3. However, level 2 qualifications and below are also important qualifications in their own right, and as a passage to work and work-related activity. These qualifications should not be considered only in relation to the transition to level 3.
5. Some industries, such as construction, hairdressing and retail, use level 2 qualifications as the industry standard for some jobs. This important role and value of level 2 qualifications in the workplace and as access to work must not be underestimated by government.
6. Our answers to questions set out below are largely supportive of the approach proposed for level two and below qualifications for young people and adults, but we strongly argue that these qualifications are also about more than progression. They provide important qualifications for work and life-skills in general. Qualifications with high levels of enrolment are evidence of high need, and even where qualifications have low or no enrolments, employers in relevant industries must voice their opinions of the value of these qualifications to their industries.
7. We note that questions 1-5 are about respondents to the consultation. This response is made on behalf of ASCL.

## **B. Answers to specific questions**

### **Questions 6 to 8: Making level 2 programmes more effective at supporting 16 to 19-year-olds to progress to level 3**

**Question 6: Would a new form of transition programme be the best way to support progression for 16 – 19-year-olds, who want to study at level 3 but are not quite ready to progress and do not plan to take a T Level? If not, please suggest an alternative approach.**

Yes, we agree that a transition programme should be offered which would support the progression of 16-19s to level 3 but who are not quite ready. The programme could be taken by those who plan to take a T level but are not yet ready, but could also be taken by those who do not wish to take a T level and instead will use the transition programme as an endpoint, as they move into work.

Any transition programme must add value and be accredited. It must be an end point qualification as well as a progression route.

Level 2 and below programmes offer a broad education and training. Research shows that young people want choice and opportunity so they can move from one programme and subject sector area to another if they find that one programme or subject sector does not work for them. Young people need breadth and choice and the option to integrate maths and English qualifications if required. Many young people and adults would gain from a transition programme so they can progress to level 3, either immediately following a level two or after a break.

**Question 7: Do you have evidence of existing effective practice in the design of study programmes to support 16 to 19-year-old students to progress to level 3? Please provide details.**

Yes. Colleges and schools have a wealth of effective practice at level 2 which supports transition to level 3. This is particularly true, but not exclusively so, in the areas of health and social care, childcare, business, media, design, computer studies and bookkeeping.

These programmes prepare young people and adults for jobs as well as further study at level 3. The idea of a transition study programme is welcome, and we would welcome the opportunity to work with awarding bodies to agree the content.

However, we do not believe the term 'transition' is helpful to those who are using such a programme to gain more skills to enter work and would prefer an alternative name such as a 'certificate in work skills for <specific sector>'.

**Question 8: Which elements should be included in a new form of transition programme to address barriers to progression to level 3?**

Elements which should be included in a transition programme to address barriers to progression to level 3 include study skills, work experience and practical work skills, as well as the opportunity for level 2 maths and English qualifications, if these are not already achieved. Other elements should include research skills to ensure those who take the programme and progress to the next stage are aware of the rigors of study at this level.

**Questions 9 to 13: Improving outcomes for students who enter employment following level 2 study (all age groups)**

**Question 9: Are there employment opportunities in your industry, additional to those on the occupational maps, for students qualified at level 2? What are they, and do they require specific level 2 qualifications?**

We agree that identifying level 2 employment opportunities in each sector is very important. However, employment opportunities are not an end in themselves. Today's jobs require flexibility and lifelong learning. We understand that 60% of level 2 learners currently do not progress to level 3 and so we believe there is a great opportunity to encourage more young people and adults to think beyond an immediate job.

In addition, setting out the pathways that lead to these level 2 employment opportunities, and the role that classroom-based study plays within them, is also important. We support the aligning of classroom-based study to employer-led standards where appropriate to that qualification.

**Question 10: Alongside apprenticeships, are classroom-based alternatives at level 2 necessary in your industry?**

Yes. Classroom-based alternatives are necessary in many industries as mentioned in our introductory comments. Classroom-based qualifications are valued by employers in a range of different sectors and have been so for many years. Industries include, but are not limited to, engineering, construction, hairdressing, social care and computing.

**Question 11: Where level 2 classroom-based study leads to employment, our starting point is that it should be aligned with employer-led standards. What further actions can we take to ensure that, as far as possible, classroom-based qualifications hold the same value in the labour market as apprenticeships and that they work alongside each other effectively?**

We agree that where level 2 classroom-based study leads to employment, it should be aligned with employer-led standards. We suggest that government and awarding bodies should work with sector-based organisations where level 2 qualifications lead to work, such as CITB, to establish and build on their views of the value of level 2 programmes.

Level 2 qualifications not only help people to get into work but they help them to stay in employment. There are many cases we can cite of young people and adults who achieve a level 2 qualification and either progress to level 3 and HE or progress to work and then take higher level qualifications whilst in work, as well as on a full-time basis.

**Question 12: What evidence can you provide of existing effective practice in the design of level 2 classroom-based study and qualifications to support students to enter employment? Please specify if your examples support students into apprenticeships or other job roles.**

We can provide examples from programmes such as those for construction, hairdressing and retail industries.

These qualifications suit entry to employment in their sectors very well. They are especially good for younger people because of the pastoral support provided, which helps them to understand the wider skills and behaviours required of work in those sectors.

For some people, level 2 is a valid end point for that stage of their life and work.

**Question 13: Where level 2 classroom-based study leads to employment, our starting point is that it should be aligned with employer-led standards. Are there any types of level 2 classroom-based study leading to employment where this would not be suitable?**

Agree. Some level 2 programmes provide a broad range of work and life skills which do not lead to a specific job role and which should therefore not be linked to specific employer-led standards. This is the case for some level two programmes in business, administration, art, performance, etc. which provide more general skills for work and progression.

**Questions 14 to 15: Level 2 study that supports adults in employment to upskill**

**Question 14: How useful are level 2 qualifications for the purpose of upskilling adults in employment? Please give specific examples or indicate whether other methods are more effective.**

Level 2 qualifications which upskill adults in employment are very important for many industries. We know from government's own research that qualifications have an impact on earnings potential and can help adults returning to work, entering work for the first time, in work progression, gaining skills and for families and the wider society. In addition to our own support for level 2 qualifications which provide access to employment or further study (explored in our answers above) and securing basic skills (in our answers below), we are able to provide examples of where level 2 qualifications are used to upskill by adults who are already in employment.

Level 2 study is used to upskill adults in employment in a number of industries. For example, level 2 bookkeeping is used by many employers to recognise the knowledge, skills and behaviours that employees need to develop in a wide variety of jobs, as well as for those supporting self-employed workers, or to build skills or progress in a related area. Short courses at level 2 equivalent and those funded by employers are also important, especially in IT-related subjects.

We strongly agree that level 2 study plays a key role in supporting adults in employment to continue study at level 3 (or higher), and to upskill in existing jobs. This could mean that for some roles, such as in hairdressing, upskilling could take the form of a number of programmes at level two in the form of horizontal progression gaining different skills. There is a place for level 2 qualifications as entry into work for adults, for upskilling, re-skilling and as an end point. Level 2 study is usually a stepping stone. We would not support any changes which close down opportunities (horizontal or vertical) for progression for adults or young people.

For adults who missed their chance to gain level 2 qualifications at 16-19, level 2 study is an important feeder into jobs, higher skills or further study.

**Question 15: Does level 2 study play a role in supporting adults in employment to progress to level 3 qualifications?**

Yes. There are many examples of level 2 study supporting adults in employment to progress to level 3 qualifications. Examples include health and social care and childcare.

Social care is a particular recruiter of adults who may not have a level 2 but will require it in their chosen field of employment if they wish to progress at a later date to level 3. Construction offers similar opportunities for adults.

Study at level 2 is important for adults, and is evidenced both by the numbers of learners and by the diverse needs of those taking these programmes. Research into level two demand shows that it is also detrimental in certain vocational areas not to fund a level 2 if the learner has higher level qualifications. In the current environment, many people who have lost higher paid jobs need to retrain in other fields to stay in employment. The CBI has estimated that about 5 million adults will need to retrain as a result of the pandemic. While the adult education budget has been severely cut over the last ten years, it is clear that more money will be needed to fund second level 2 qualifications to support adults and young people entering unemployment.

We believe there are links here between the consultation at level 3 and this consultation which need to be further explored.

### ***Questions 16 to 19: Effective level 1 and entry level study for 16 to 19 year-olds***

This cohort of learner will be impacted by any changes to level 2 and 3 as a result of the review and so it is extremely important that they are not disadvantaged. It is also important to note that, in some cases, non-accredited learning is highly valued by learners and providers.

We agree that, alongside English, maths and digital skills, level 1 and entry level study covers skills for employment or living independently, and introductory vocational training. Employability skills (mostly at level 1 and entry level but can also be found at level 2) tend to cover interview skills, building a student's self-belief in their capacity to work, networking, CV writing and effective communication. Personal, social and independent living skills (mostly at level 1 and entry level) tend to cover identifying your own strengths and weaknesses, and help provide students with everyday skills for life.

We agree that level 1 and entry level provision is often used to provide 'broad life skills', build confidence, and motivate and engage students to continue in further study. We know too that level 1 and entry level study might cater for a wide range of student need, experience, and motivation.

We agree that good outcomes of level 1 study are for students to go on to higher levels of classroom-based study or the work-based pathway (supported internships, traineeships or apprenticeships).

We agree that most of those who study at entry level at age 16, progress to higher levels of study the following year or remain at entry level and a small proportion leave education.

We appreciate the need to streamline the complex landscape of level 1 and entry level qualifications so that every qualification has a clear purpose. We also agree that tailoring and sequencing the curriculum to fit students' individual needs is key to effective level 1 and entry level provision. We agree that the key components of level 1 and entry level study programmes are:

- English, maths and digital skills

- introductory vocational skills and knowledge where appropriate and in line with a student's motivations;
- information, advice and guidance (IAG)
- work experience
- personal and social development (e.g. communication skills), and
- employability skills (e.g. CV writing, interview skills).

We would add that level 1 and entry qualifications are also taken by young people who, for various reasons, have missed chunks of their education and need to develop the skills in a sequential way. For example, those who have had home learning, hospital learning or who have not received some part of their core learning entitlement as a result of exclusions.

**Question 16: What are the main factors providers consider when deciding whether a student should start at entry level rather than level 1?**

The main factors when deciding if a student should start at entry level or level 1 are previous study and achievement, subject sector specifications, employment status (if relevant) and desired outcomes. Added to this, providers will consider the confidence of the learner to study, their past learning experience and their educational needs. It should also be noted that, in some cases, non-accredited learning is highly valued by learners and providers as well as employers.

**Question 17: How do providers define good outcomes for 16 to 19 year-olds studying at entry level? Which features are most effective in achieving these good outcomes? Please refer to the features listed in paragraph 56 in your response.**

Providers generally define good outcomes for 16-19 year-olds studying at entry level as those which enable the learner to cope with progression to higher study, work or volunteering or related activity. We also define maths and English achievements as good outcomes.

**Question 18: What are the main factors providers consider when deciding whether a student should begin study at level 1 rather than level 2?**

The main factors providers use to consider whether a student should begin study at level 1 or level 2 are the academic and practical demands of a level 2 programme. If the student is likely to gain from starting on a higher-level programme then providers will aim to start there as long as the student is able to cope with the demands of the programme and will be able to progress from that programme to their desired outcome of further study or work related activity.

**Question 19: How do providers define good outcomes for 16 to 19-year-olds studying at level 1? Which features are most effective in achieving these good outcomes?**

Providers define good outcomes for level 1 as the achievements of the learner in terms of characteristics, maths, English, and study skills progress and achievement of relevant employability skills. At the same time, the student should have had good quality career advice to help them decide on the best route for them.

**Questions 20 to 21: Level 1 and entry level study for adults**

**Question 20: How do providers deliver personal, social and employability skills to adults? Is a qualification essential for this?**

Yes, these qualifications are often essential for adults as they are an indicator of the adult's ability to study and to function in society and work. Employers value qualifications at all levels, as do the individuals who take them. This is particularly true for individuals who have been out of work for a long time or who have no work history.

**Question 21: How do providers deliver introductory vocational level 1 and entry level skills to adults? Is a qualification essential for this?**

Yes, a certificate of attainment is necessary. Usually introductory vocational level 1 and entry skills are the building blocks for that sector, such as basic health and safety, time management, relationships with others, etc.

***Question 22: Entry level qualifications (all age groups)***

**Question 22: What are the benefits of having three sub-levels at entry level?**

The benefits of the three sub-levels at entry level are that they provide small steps from which the student can progress to the next level. This is important both in terms of vocational skills and personal, social and study skills.

***Question 23: Personal, social and employability qualifications – a question for employers***

**Question 23: When you are recruiting, do you value or recognise qualifications in employability, personal and social skills, or independent living?**

Yes. Employers recognise personal, social and employability skills in many sectors. In particular, in people-facing industries such as hospitality and retail, these qualifications are very important to ensure that the individual assists the business and gets on well with customers. These skills are also, importantly, transferrable.

***Questions 24 to 25: English and maths qualifications***

**Question 24: Which students are GCSEs and FSQs not appropriate for, and why? What are the most effective features of alternative English and maths qualifications?**

Adult students with limited understanding of maths and English find GCSEs and FSQs more difficult to get to grips with. As they come to study with non-sequential learning, the formality and demands of those qualifications are greater. However, we need to validate English and maths qualifications for adults, especially those aged 19-24 as employment often requires this. These qualifications are still very relevant.

**Question 25: Are the National Standards for Adult Literacy and Numeracy and the Adult English Literacy and Numeracy Core Curriculum still relevant for the English and maths qualifications that are available alongside GCSEs and FSQs?**

Yes. While we understand the need to review these standards, some employers know and use the national standards in setting job roles and job descriptions. In particular, the importance of digital literacy and numeracy is increasing. We should not underestimate the importance of these skills at any level. Adults need access to IT and equipment for learning in the same way as young people.

### ***Questions 26 to 28: ESOL***

#### **Question 26: Which features of ESOL qualifications are most effective in supporting students to progress to further learning or into employment?**

ESOL qualifications are very important for the students who take them and for their employers. For example, when an individual's first language is not English, but their proficiency in English language is important for the job, such as childcare or health and social care. The national standards for literacy and core curriculum are also important in these areas so that the level of understanding of the student/employee is clear.

#### **Question 27: Are ESOL qualifications at levels 1 and 2 necessary? If yes, what role do they play?**

Yes. Individuals come to these qualifications with a variety of understanding, and gaps in their learning and knowledge of English. They require these gaps to be filled. ESOL qualifications are very important even after Brexit as they bring a benefit to work and to society as well as the individual. However, the needs of ESOL learners are very diverse, so the qualifications need to help develop a broad knowledge and well as deepening understanding of society.

#### **Question 28: Are the National Standards for Adult Literacy and ESOL Core Curriculum still relevant and useful in relation to ESOL qualifications and their teaching?**

Yes. They provide a baseline for the adult students, their teachers and employers.

### ***Questions 29 to 30: Questions about English, maths and ESOL for employers***

Our experience suggests that employers do recognise English and maths qualifications (that are not GCSEs or FSQs) or ESOL qualifications when recruiting or promoting staff.

#### **Question 29: When you are recruiting, do you value or recognise ESOL qualifications or do you assess communication and language skills in different ways?**

Yes. Qualifications which are taken by those who go into employment in childcare and health and social care, hospitality and retail are examples are valued.



**Question 30: When you are recruiting, do you value or recognise English and maths qualifications that are not FSQs or GCSEs?**

Yes. Examples include other qualifications taken abroad and in this country which reflect an individual's English and maths ability.

***Question 31: Digital skills qualifications at level 2***

**Question 31: Do you agree that we should remove funding approval from the level 2 ICTFSQ and level 2 ICT User qualifications?**

We agree that some of the ICT qualifications are no longer needed as young people and adults are developing those skills in other ways. We also agree that entry and level 1 programmes in ICT should not be in scope for this review. However, we believe that the level 2 ICT user qualifications should still be funded.

***Question 32: Supporting students with special education needs, learning difficulties or disabilities at level 2 and below***

**Question 32: What needs to be retained or improved in the current level 2 and below offer to ensure that providers can accommodate the needs of i) 16 to 19 year-olds with SEND and ii) adults with learning difficulties or disabilities?**

It should be noted that for both 16-19 year-olds and adults with SEND, in some cases, non-accredited programmes which focus on personal and social skills are important and highly valued for this group of learners.

- i) For 16-19s with SEND, the qualifications which provide certificates or diplomas to individuals for life and work are most important and must be maintained. It must also be remembered that SEND can take a diverse range of forms so individuals may be able to study at a variety of levels depending on the subject area. A modular approach may be helpful here.
- ii) For adult with learning difficulties or disabilities, the same is true. Whatever the learning needs, individuals of all ages value qualifications which enable them to demonstrate learning and progression to life and work. In addition, given the current labour market, we must do everything we can to ensure that adults with learning difficulties and disabilities are not disproportionately affected by the scarcity of jobs.

## **C. Conclusion**

- 8. We believe that there is a degree of 'snobbery' around level 3 study. It is not the case that all learners will want to or be able to attain that level. We also believe that standalone level 2 qualifications are important in many sectors, and employers value them. Level 2 qualifications are worthy in their own right in most cases and they keep employability and upskilling options real for many people currently in the workplace. We strongly encourage government to look at the value of learning to adults as well as young people, and to keep diverse and flexible options to study open as much as possible, including considering horizontal as well as lateral progression. In addition, funding for adult learning needs to be considered in the

broader context in this review, as older adults often need access to learning to keep them in work.

9. Level 3 is a progression for young people and adults with level 2 qualifications, and there are many late starters in education who do not reach level 3 until much later. The opportunity to attain level 2 qualifications is important for wellbeing and for society as well as for employment.
10. We are grateful for the opportunity to contribute to this consultation. We hope that this response is of value to the process. ASCL is willing to be further consulted and to assist in any way that it can.

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5 February 2021*