

## Review of post-16 qualifications at level 2 and below

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

#### A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 22,000 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 and skills phases. 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. ASCL welcomes the opportunity to contribute to this consultation. Our [Blueprint for a Fairer Education System](#) sets out our proposals for a fairer education system. Working with organisations such as the Education Policy Institute, the National Foundation for Educational Research and Public First, our Blueprint includes evidence which supports the benefits of a more equal society, and recommends actions that both policymakers and school and college leaders might take to move towards an education system which promotes social equality and improves the life chances of children, young people and adults from disadvantaged backgrounds. This includes those who start out taking level 2 and below qualifications at post 16, which is the subject of this consultation.
3. We believe strongly that any changes to level 1 and level 2 qualifications should start with the needs and aspirations of students who study at these levels. There should not be change for the sake of it. Any changes made should ensure that those who take these qualifications to progress to further study or employment should be able to do so without facing any barriers, whether educational, social or financial.
4. We also believe that young people and adults need impartial careers advice and clear progression routes within a system of qualifications which will take them through school and college to employment or higher education and enable them to achieve their ambitions.
5. Whilst agreeing with some of the proposals, we argue that the proposed changes should not work against students with learning disabilities or those who rely on entry, level 1 and level two qualifications to progress in their chosen careers, onto a level 3 qualification or into higher education. This level of education requires investment in learning and not the removal of funding or barriers to access.

#### B. Answers to key questions

##### Question 6:

- i) **Do you agree that we should fund qualifications that support progression to level 3 technical provision?**

6. Yes. Most industrial sectors have level 3 qualifications associated with jobs which employees and those wishing to enter the professions and skills sectors aspire to. It is important to fund progression routes to all level 3 technical provision.
- ii) Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-240 GLH?**
7. No. Level 2 qualifications, and level 3 in most cases, need to have more hours as they provide skills for life, maths and English qualifications, progression to employment and apprenticeship. They should be funded as full-time programmes for one or two years. Level 1 and below qualifications could be shorter programmes in some cases, when it is clear that progression will be to level 2 and beyond. However, for about a quarter of young people and adults, this is their final qualification so it should have a substantial teaching input.

**Question 7:**

- i) Do you agree that we should fund occupational-entry qualifications leading to employment at level 2?**
8. Yes. There are many occupational areas which have entry level qualifications at level 2 for learners to help them understand the basics of those skills. It would be ill-advised not to fund occupational-entry qualifications at level 2.
- ii) Do you agree that these qualifications should include broad route-specific content as well as the knowledge, skills and behaviours required to enter an occupation?**
9. Yes. Broad route-specific content is important for learners who will be entrants to a specific sector, whatever sector that might be. This applies to young people and adults who have no experience of a specific industrial sector.
- iii) Do you agree that these qualifications should be large in size (minimum 540 GLH)?**
10. Yes. They should be the same size as a full-time programme for one year at level 3 (which is 580 GLH from September 2022). This will allow providers to cover all relevant content and give practical experience in the skills, behaviours and understanding of the wider industrial sector being studied.

**Question 8: For 16 to 19 year olds aiming to enter employment in an occupation at level 2, do you agree that the main qualification offer that should be available is:**

**Option A: Group 2 qualifications only**

**OR**

**Option B: Group 2 qualifications and the alternative of taking two smaller occupational-focus qualifications from group 3 (around 350 GLH) in two different occupational routes?**

**Please give reasons for your answer.**

11. Option A and Option B should both be available for those who wish to enter employment at level 2. No one size fits all circumstances.

12. There are many jobs which have qualification entry points at level 2. For some this may be qualifications only and for others, such as the care industry, work experience and other shorter occupationally focussed qualifications, such as health and safety, should also be on offer. There is no single right solution as each occupational area tends to differ in terms of what works best for that sector or area of a sector.

**Question 9:**

**i) Do you agree that these qualifications should be delivered to 16 to 19 year olds over two academic years as part of a wider study programme leading to employment?**

13. No. For many young people and adults, a one-year study programme at level 2 is what they aspire to and is a requirement for entering employment in an occupational area such as construction or hairdressing. It may not be helpful to some of those young people or their future employers to extend the programme to two years. However, for those who do not yet have a job, a wider study programme over two years might be exactly what is needed. We believe that the qualifications structure should not shoehorn students into one model as this will not help their retention or progression into work or further study.

**ii) If you believe there are any groups of students or occupational routes for which a substantial qualification taken as part of a two-year study programme would be unsuitable, please provide details.**

14. Level 2 in construction is an example of a programme which needs to be substantial so that the individual can learn the basics as well as understanding their chosen industry. Level 2 in manufacturing and engineering may be other examples.

**Question 10: Do you agree that we should fund specialist qualifications at level 2? If you agree, are there any examples of qualifications that you think might fall into this group?**

15. Yes. There are several specialist qualifications at level 2 for all ages which should be funded, including those in digital skills which lead to specialist jobs. There are also those in the care industry, construction, animal management and many other sectors, which should continue to be funded.

**Question 11: Do you agree that we should fund qualifications at level 2 that develop cross-sectoral skills for young people?**

16. Yes. For some young people, cross-sectoral skills are needed. An example may be in retail, information technology or media, but there will also be other examples where cross sectoral skills are needed to work in specific roles.

**If you agree, are there any examples of qualifications that you think might fall into this group?**

17. Yes. This includes qualifications mentioned above and in care and childcare, for example, as well as digital, graphical, games development and information technology.

**Question 12:**

**i) Do you agree that we should fund qualifications to support progression to specialist level 3 academic qualifications?**

18. Yes. In some sectors, such as areas of business and finance, progression to specialist academic qualifications is relatively common practice.

19. An apprenticeship at level 2 should offer the opportunity to progress to specialist academic qualifications at level 3, as well as to a level 3 apprenticeship. There should not be barriers to progression routes at this level.

**ii) Do you agree that qualifications in this group should be small-medium sized, with a guideline size of 120-240 GLH?**

20. No. As we answered in questions 6 and 7, they should either be large programmes or part of a funded package of qualifications which together make up 580 GLH over one or two years as in option B in question 8.

**Question 13:**

**i) Do you agree that we should continue to fund level 2 performing arts graded exams in their current form?**

21. Yes. Those who graduate from these programmes often progress to work or further study and in a variety of sectors working with people, including care and childcare.

**ii) Do you agree that we should continue to fund level 2 Higher Project Qualifications in their current form?**

22. Yes. We also suggest that, where these qualifications lead to employment or further study, they should be funded in their current form.

**Question 14:**

**i) Do you agree that we should fund level 1 pre-technical qualifications which focus on progression to level 2 and provide an introduction to the relevant occupational route?**

23. Yes. These programmes are very important for learners who lack other work-experience or work-related skills and need a longer and more technical or academic programme to achieve a job or progress to further study.

**ii) Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-280 GLH?**

24. No. They may be part of a wider programme but collectively, learners should be able to undertake a full-time programme at level 2 which is 580 GLH or more in order to be ready for employment or apprenticeships or further study.

**Question 15: Do you agree that we should fund level 1 qualifications which act as a prerequisite to employment?**

25. Yes. There are several programmes at level 1 which are a pre-requisite to employment. This is true for some jobs in the care industry, for the catering industry and the digital, graphical and IT industries as these programmes provide a good progression route for those who are the backbone of those sectors but will not progress to level 2 or above.

**Question 16:**

**i) Do you agree that we should continue to fund level 1 graded qualifications in performing arts in their current form?**

26. Yes. For some learners, these qualifications are the foundation for their future careers, including in the media or communications industries, for example.

**ii) Do you agree that we should continue to fund level 1 Foundation Project Qualifications in their current form?**

27. Yes. This qualification often helps students who are not yet ready to progress to level 2. They can undertake a project in an occupational area which helps them to progress to readiness to study at level 2.

**Question 17:**

**i) Do you agree that we should fund entry level 3 pre-technical qualifications that support progression to level 1 study?**

28. Yes. These qualifications, for example in cleaning, catering and housekeeping, are particularly helpful for learners with SEND. It is important for equalities that such learners are able to attain qualifications which reflect what they can offer to the world of work.

**ii) Do you agree that, for 16- to 19-year-olds, qualifications in this group should be small to medium sized, with a guideline size of 120-280 GLH?**

29. Yes, but they should be funded as part of a broader package of qualifications. It should be possible for a learner to study several small or medium size qualifications and together be funded as a full-time student.

**Question 18: Do you agree that we should continue to fund entry level graded qualifications in performing arts in their current form?**

30. Agree. For some learners, especially those with SEND, these qualifications are very important. The content of the qualifications should ensure that those who takes them can progress to a range of roles and further study, with the qualifications being recognised by employers.

**Question 19: Do you agree that the design and delivery principles outlined in paragraphs 150 to 155 will ensure that level 2 technical qualifications are accessible to adults?**

31. The principles are appropriate, and level 2 technical qualifications must be accessible to adults as well as young people.

**Question 20: Do you agree that we should fund the following level 2 qualification groups for adult learners:**

**Group 1: Qualifications supporting progression to level 3 technical study YES**

**Group 2: Occupational-entry qualifications YES**

**Group 4: Specialist qualifications YES**

**Group 5: Qualifications supporting cross-sectoral skills YES**

**Group 7: Qualifications supporting progression to level 3 academic study**

32. Yes. In all cases set out above, there are adults, as well as young people, who will wish to undertake qualifications within these groups.

**Question 21:**

**i) Do you agree that we should fund occupational-focus qualifications at level 2 for adults?**

33. Yes. It is important for adults to be able to take not only a first level 2 but subsequent level 2 qualifications to upskill or change jobs.

**ii) Do you agree that these qualifications should be medium sized, with a guideline size of 200-540 GLH?**

34. Yes. Adults may have the experience and knowledge to study qualifications in fewer GLHs and should not be required to study a full-time programme, unless they need the additional input or study time. However, there does need to be a means by which prior experience, skills and achievement can be assessed and recognised.

**Question 22:**

**i) Do you agree that we should consider requests to fund level 2 qualifications for occupations for which an employer-led occupational standard does not currently exist?**

35. Yes. There will be new employer-led standards coming forward, such as for the green industries which currently do not exist.

**ii) Are you aware of any occupations that are in demand by employers but where an employer-led occupational standard does not currently exist?**

36. No, but there are very few occupational standards in the green industries and these standards will be needed in due course.

**iii) Do you agree that these qualifications should be available to adults only?**

37. No. The qualifications should be available to both young people and adults.

**Question 23: Do you agree that we should fund the following qualification groups at level 1 for adult learners:**

**Group 9: Level 1 pre-technical qualifications supporting progression to level 2 study**

**Group 10: Level 1 qualifications serving as a prerequisite to employment**

**Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications**

38. Yes. In all cases, as set out in our answer to question 20, there will be adults who will need to take these qualifications at level 1, as well as at level 2.

**Question 24: Do you agree that we should fund the following qualification groups at entry level for adults:**

**Group 14: Entry level 3 pre-technical qualifications supporting progression to level 1**

**Group 15: Entry level performing arts graded qualifications**

39. Yes. As in our answers to questions 20 and 23, there will be adults who need to take these qualifications at entry level, as well as levels 1 and 2. There will also be learners with SEND who would want to take these qualifications.

**Question 25:**

i) **Do you agree we should remove funding at level 2 for non-GCSE/FSQ English qualifications?**

40. No. There will be adults who are unable to complete GCSEs and FSQs in English for whom other qualifications are more suitable.

ii) **Do you agree we should remove funding at level 2 for non-GCSE/FSQ maths qualifications?**

41. No. As in our answer to question 25, there are adults for whom non-GCSE/FSQs in maths are more suitable.

**Question 26:**

i) **Do you agree we should continue to fund level 1 and entry level English qualifications for learners who cannot access FSQs/ GCSEs?**

42. Yes.

ii) **Do you agree that we should continue to fund level 1 and entry level maths qualifications for learners who cannot access FSQs/GCSEs?**

43. Yes.

44. It is important that those who are not yet ready to access level 2 English and maths, whether GCSE/FSQs or non-GCSE/Non-FSQs, are able to take level 1 and entry maths and English, should they wish to do so.

**Question 27:**

i) **Do you agree all non-GCSE/FSQ qualifications in English should be developed against the National Standards for Adult Literacy and Numeracy?**

45. Yes – as far as this is possible, and the standards have been updated.

ii) **Do you agree all non-GCSE/FSQ qualifications in maths should be developed against the National Standards for Adult Literacy and Numeracy?**

46. Yes – as far as this is possible and the standards have been updated.

**Question 28: Do you agree that we should consider updating the National Standards for Adult Literacy and Numeracy before adding them to the regulation criteria?**

47. Yes. It makes no sense to add the national standards to the regulation criteria until they are updated.

**Question 29: Do you agree that we should continue to fund ESOL qualifications at each of the following levels:**

**(i) Level 2**

**(ii) Level 1**

**(iii) Entry level (including sub levels 1,2 and 3)**

48. Yes. ESOL qualifications are very important for a growing population for whom English is not their first language. These qualifications are well known and understood by employers as well as learners.

**Question 30: Do you agree that we should develop national standards and set broad core content at level 1 for:**

**i) Personal and social development**

49. No.

**ii) Employability skills**

50. Yes.

**iii) Independent living and life skills**

51. No.

52. There is no benefit in developing national standards for personal and social development or independent living and life skills when these are constantly changing. However, employability skills do not change at the same rate and could be set against national standards and broad content.

**Question 31: Do you agree that we should develop national standards and set broad core content at Entry level (including entry level 1, entry level 2 and entry level 3) for:**

**i) Personal and social development**

53. No.

**ii) Employability skills**

54. Yes.

**iii) Independent living and life skills**

55. No.

56. See our answer to question 30 above.

**Question 32: Do you agree the national standards set out above will cover the range of skills needed by students?**

57. No for employability skills. They should be extended to include more about IT skills and online skills in the workplace.

**Do you believe there is a need to develop additional national standards? If so, please tell us what the standard should contain and which students it would benefit?**

58. No. This is far too restrictive to be helpful.

**Question 33: Thinking specifically about employability skills:**

**(i) As an employer, do you currently recognise or value any qualifications in employability skills? If so, how do you recognise them and what aspects of these qualifications do you value?**



59. N/A

**(ii) Will the proposed national standards make a difference to the way these qualifications are perceived, valued or recognised by employers?**

60. Yes. See our answers to questions 30 and 31. They will be recognised and valued more by employers if they know about the national standard.

**(iii) If so, what difference will they make and how would employability qualifications aligned to standards be used by employers in the future?**

61. If there is consistency in employability qualifications aligned to standards in English, maths and IT skills at each level, this is likely to increase the desirability and reputation of those qualifications, as long as the standards and qualifications are updated as necessary.

**Question 34: Is it necessary to have standalone qualifications at entry level 1 and entry level 2 that provide students with an opportunity to explore industries and occupations?**

62. Yes. Often these qualifications are tasters for the industry and are important for learners to understand the fundamental principles of that industry.

**Question 35: What support is needed to smooth the implementation of the proposed reforms to level 2 and below qualifications?**

63. Any reform must be taken slowly and not be implemented for the sake of change. Providers as well as parents, employers and learners will need time to accommodate change. There should not be change for the sake of it.

**Question 36: Do you have any concerns regarding the potential impact that the principles and proposals outlined in this consultation may have on students with SEND or those with a protected characteristics under the Equality Act 2010?**

64. Yes. Learners with SEND need to be able to access a wide programme to help them achieve a job or further study. It would not be helpful to remove any of the qualifications taken by learners with SEND from funding.

**Question 37: Are there any additional impacts that you think should be included in the general impact assessment which will accompany our response to this consultation?**

65. Yes. As well as learners with SEND, the impact assessment should consider what impact Covid has had on the mental health and wellbeing of learners at all levels and particularly on those who struggle to gain qualifications, employment and progress to further study.

## **C. Conclusion**

66. Our response, as mentioned above, relies heavily on feedback from our members and others in the sector.

67. We feel strongly that level 2 and below qualifications must be funded appropriately so that all learners can access the skills, knowledge and further training and employment which they need at post-16 and into adulthood. This will help to make

the post-16 education system fairer and more accessible for all, as well as raise the profile of technical and vocational education amongst stakeholders.

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

*Dr Anne Murdoch, OBE,  
Senior Advisor, College Leadership,  
Association of School and College Leaders  
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