

## **Review of post-16 qualifications at level 3 in England: Second Stage**

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

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 20,000 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. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. Key points**

3. ASCL welcomes the introduction of T Levels and the new focus that this brings to vocational education. However, there are many aspects of the existing vocational provision at level 3 that already meet the three key principles of the review, i.e. “clear purpose”, “high quality” and “successful progression”. These qualifications should not therefore be defunded until we have evidence that the new T Level qualifications are working successfully and have not left any gaps in provision that will disadvantage students.
4. Our five key five points are as follows:
  - The focus of progression from T Levels into higher level technical training is welcomed – but the ability to also move across to a more traditional HE degree is also necessary. Unfortunately, many universities have still not agreed to consider T Levels as part of their entry criteria. This could mean that students who successfully study T Levels but then want to bridge across to an undergraduate qualification would have more limited options than existing vocational students. This is bad for social mobility, as vocational qualifications are disproportionately studied by the more disadvantaged students.
  - The partnership between employers and T Level providers is very exciting and is at the heart of the qualification. However, if there are not any local providers in a particular geographical area (so-called “cold spots”) then T Levels quite simply cannot be offered. Alternative vocational qualifications therefore need to be available for these students.

- The ‘all or nothing’ nature of T Levels also means that, for students who may be struggling with some aspects of the T Level programme but are able to successfully complete part of it, there is not an option for them to reduce their programme and end up with a reduced qualification (as can be done by A level students moving down to two A levels from three, or by AGQ students moving down to a subsidiary diploma or certificate from an extended diploma). This lack of a safety-net will mean more students will end up with no qualification at all, and is likely to disproportionately impact on the most disadvantaged students.
- T Levels are a full-time, immersive, ‘all or nothing’ experience in one area of vocational learning, e.g., digital or business. This means that students cannot take any other qualifications alongside a T Level (Further Maths notwithstanding). This might be suitable for students who have always wanted to work in a particular occupational area, but it does not allow for students who are less certain (particularly with the lack of vocational education experienced at key stages 3 and 4). Such students may like to try part of their study programme in a vocational area, i.e., a ‘mixed’ academic and vocational programme. This mixed programme is highly popular and highly successful for progression to HE, particularly amongst more disadvantaged students.
- We accept that there is overlap of content between some A levels and some vocational subjects, e.g. A level business and BTEC subsidiary diploma in business; or an A level in science and BTEC subsidiary diploma in science. Crucially, however, the style of learning and assessment is different between the different qualifications (exacerbated by the move to linear A levels). This is important for students who are yet to discover which style suits their learning best. This is another reason for a mixed style of learning programme.

### C. Answers to specific questions

Q6 – Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16- to 19-year-olds choosing technical provision?	Yes, we agree that qualifications providing occupational competence against employer-led standards which are not covered by T Levels, should be funded. Additional specialist qualifications should also be funded.
Q7 – Do you agree with the funding criteria described in paragraph 47 for the other technical qualifications we propose to fund for 16- to 19-year-olds (qualifications providing occupational competence against employer-led standards which are not covered by T Levels and additional specialist qualifications)?	Yes, we agree with the funding criteria as it would apply to the two groups of qualifications as referred to above.
Q8 – Should the Institute create additional T Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s)/occupation(s) and explain	Yes - there is a glaring omission by not having a T Level in sport-related occupations.

why.	
Q9 – Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52 to 66? Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?	We do not agree with the process as indicated. The definition of overlap is not clear and therefore it is reckless to agree on an approach before we see evidence of what constitutes overlap. Also, we need to be clear about whether we are referring to overlap of <b>content</b> or <b>skills</b> or <b>both</b> .
Q10 – Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?	<p>We do agree that the types of small qualifications that are typically taken alongside A levels, e.g. a small health and social care qualification which can be taken alongside A levels in biology or sociology to access a degree in nursing, should be funded. This is important for flexibility and progression.</p> <p>However, we do not agree with the following assertion in paragraph 73: “qualifications in business or science are unlikely to be funded since the A level equivalents will provide the best preparation for relevant HE courses”. Whilst this may well be true in some cases it is not <b>always</b> true – many other qualifications, particularly AGQs, prepare students equally well and in some cases the broader range of skills covered in them prepare students better. The proposed approach is therefore too crude.</p> <p>AGQs should also be funded alongside A levels under the very popular and successful mixed economy approach that serve our school sixth forms and colleges so well at present. Other qualifications such as the LIBF financial-related qualifications also have a very strong track record in providing progression opportunities, particularly when combined in a mixed programme with A levels.</p>
Q11 – Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?	Yes.

<p>Q12 – Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?</p>	<p>See response to Q.10 above. Vocational qualifications that allow students to mix and match their 16-19 study programme should also continue to be funded, e.g., a study programme consisting of 2 A levels plus a BTEC Subsidiary Diploma.</p>
<p>Q13 – Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?</p>	<p>We agree that qualifications supporting progression to specialist HE courses should be available as alternative programmes of study to A levels, e.g. performing arts or sport qualifications. They will have a strong practical focus and offer breadth and depth that is valued at HE for study in an allied subject, e.g. a qualification in sports and exercise science.</p> <p>However, we disagree that there will inevitably be only “a small number” of qualifications that will meet these criteria. Because we believe that A levels should be allowed to be mixed and matched with vocational qualifications there should be a broad range available to students. We do accept that large qualifications for which there is an overlapping T Level (options mentioned being IT or science) may need to be removed – but only after T Levels have been proven to be successful. This is unlikely to be within the timeline as proposed.</p> <p>Note our definition of ‘large’ is the equivalent of 3 A levels, e.g. the Extended Diploma.</p>
<p>Q14 – Do you agree with our proposal the IB Diploma should continue to be funded?</p>	<p>Yes. The IB Career Programme should also be funded.</p>
<p>Q15 – Do our proposals for academic qualifications for 16- to 19-year-olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high-quality higher education?</p>	<p>Whilst the proposals do provide opportunities for HE progression, they will not offer as good a set of opportunities as at present. For many students, the ability to mix and match their study programme affords them a much greater choice of HE opportunities than if they had just completed A levels. This is because the skills developed by undertaking vocational</p>

	<p>qualifications are often greater than through an A level programme only, e.g. portfolio building, team/project work and different forms of assessment. Having experienced this more applied learning may significantly broaden a student's choice of HE programme.</p>
<p>Q16 – What additional support might students need to achieve the new high-quality offer at level 3?</p>	<p>The impact assessment indicates that a large number of students (perhaps as high as 4%) may be unable to access the new high-quality offer at level 3 without additional support. We are therefore talking about thousands of students who would be denied an opportunity to take a level 3 programme, yet the evidence shows that many of these borderline level 3 students on whom providers 'take a chance' go on to be successful. The alternative programme that these students would undertake instead is totally unclear (unless it is supposed to be the new unproven transition programme – this needs urgent clarification/confirmation).</p>
<p>Q17 – What additional support might SEND students need to achieve the new high-quality offer at level 3?</p>	<p>Proper assessment of their individual strengths and weaknesses through their EHCP and then properly funded support put in place. There would need to be flexibility with the industry placement in many cases.</p>
<p>Q18 – Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?</p>	<p>It is extremely worrying that the impact assessment states, "students with special educational needs and disabilities (SEND) are more likely than their peers to take qualifications that could be defunded as a result of these reforms". Whilst the consultation boldly states that "these accessibility requirements have been built into T Level design", the evidence from the first wave of students on T Levels is that this is not the case. We need to see the published numbers of students who have been accepted on T Levels, and how they are coping, before any level 3 qualifications are defunded.</p>
<p>Q19 – Do you agree with our proposal to</p>	<p>Yes</p>

fund the same academic options for adults as 16- to 19-year-olds?	
Q20 – Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16- to 19-year-olds in exceptional circumstances)?	Yes
Q21 – Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?	The use of modular assessment, recognition of prior learning and changes to the summative assessment are suitable principles.
Q22 – Do you agree with our proposed approach to making T Levels available to adults?	Yes. Accepting that providers are best placed to design their own curricula, including learning modules, which suit their specific context and adult student needs, is a sign of trust in the sector which is to be welcomed.
Q23 – Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?	In principle we agree, but the technical implementation of the proposals seem vague at best. More clarity over APL is therefore needed.
Q24 – Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?	In principle we agree, but again this should not be at the expense of other qualifications that adults and employers find helpful for those returning to work after long periods of inactivity.
Q25 – What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116 above)?	ASCL has no particular view on this.
Q26 – Do you agree with our proposed approach to reforming technical qualifications?	We do not have any evidence to believe that the greater role proposed for the Institute (in designing/approving technical qualifications) is not the best approach.
Q27 – Is there anything else we should consider when implementing our proposed approach?	The Institute is considered by some to be poorly representative of smaller businesses who may have different views on what constitutes the right technical qualities from their employees.
Q28 – Do you agree with the proposed approach to qualifications in apprenticeship standards?	As per the response to Q.27, some employers recognise the “currency” of certain qualifications. The Institute needs to gather this information and appraise accordingly before removing qualifications from apprenticeships.
Q29 – Do you agree with our proposed	The longer-term reform of academic

<p>approach to reforming academic qualifications?</p>	<p>qualifications should be down to Ofqual and AOs, with proposed reforms being fully consulted on with the sector. There should not be a focus on accountability measures and performance tables as part of this process, but rather on what qualifications best facilitate progression for the learners.</p>
<p>Q30 – Is there anything else we should consider when implementing our proposed approach?</p>	<p>The proposed approach referred to here is that the only academic qualifications available alongside A levels are those that <i>“support progress to specialist HE that are taken as alternative programmes of study to A levels, and the qualifications that offer complementary and additional skills to support progression to HE when taken alongside A levels”</i>. We agree that performing arts graded qualifications, core maths, AEs and EPQs clearly support the progression argument. However, the AGQ, when taken alongside one or more A levels, can often provide the “complimentary and additional skills” so <b>should therefore continue to be funded.</b></p>
<p>Q31 – What support is needed to smooth the implementation of the proposed reforms?</p>	<p>This is the wrong question. A more pertinent question is whether the proposed reforms are capable of being implemented within the proposed timeline. We would say in the strongest possible terms that they are NOT. Popular qualifications such as the AGQ should not be defunded until there is clear evidence that T Levels are providing successful progression (which we hope there will be) and that T Levels are available in all parts of the country, with no ‘cold spots’.</p> <p>It is highly likely that alternatives to real-life industrial placements will need to be established, given the other priorities that business will have because of the pandemic. The timeline for defunding AGQs must be delayed until this aspect of T Levels has been established and been seen to work for all young people, irrespective of the region of the country in</p>

	which they happen to live. Otherwise, we are saying to young people that certain types of vocational/technical training are not available to them. This is clearly unfair.
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**D. Conclusion**

- 5. I 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.

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Association of School and College Leaders  
15 January 2021