

University Alliance response to the Review of post-16 qualifications at level 3 in England second stage consultation

Question 6: Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16-19 year olds choosing technical provision?

Yes

Alliance universities are very supportive of T Levels as a progression route to a range of higher education provision, and many are utilising their long-standing partnerships with FE colleges to support and promote the rollout of T Levels in their regions. Two Alliance universities were quoted in the 2020 T Level Action Plan, published in January 2021.

The two groups of qualifications outlined in the consultation will be important features of the landscape but will not meet the needs of all students. We are concerned that further stratifying qualifications into ‘academic’ and ‘technical’ routes and limiting the flexibility for students to take a blended approach will limit choice and create a divide that often does not exist in post-18 education and employment. Our members recruit students holding both AGQs and A Levels, and in some cases this proportion is higher than those holding AGQs only. These students study a range of subjects, including but not limited to: allied health courses such as nursing and midwifery; creative arts subjects such as music, media, and film production; business; computer science; and sport and service management.

We see there being value in retaining a category of general vocational qualifications which have some overlap with A Levels and T Levels. This should include provision for the creative arts, fine arts, and performance arts, which are not well covered by occupational standards. This category of qualifications would support widening participation and retention, allowing students to defer specialisation while exploring a broad vocation, or choose a blended qualification offer that gives them a broader set of transferable knowledge and skills for future employment or higher education.

We do not see retaining some general vocational qualifications as being at odds with ambitions to put employers at the heart of technical education, which we fully support. There is a need for qualifications at level 3 that align with employer-led standards, with clear progression routes for students to achieve occupational competence at higher levels should they wish to. We also see an important role for employers in other parts of the qualifications landscape, including advising Awarding Organisations, delivery providers and IAG providers. Alliance universities design and deliver their programmes in partnership with employers, regulators, and professional bodies. This approach is not just taken for higher and degree apprenticeships or

courses leading to regulated professions and includes those linked to broad job areas such as business and the creative arts.

Question 9a: Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52-66?

No

Question 9b: Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?

A range of factors should be considered when deciding overlap with both T Levels and A Levels, including whether the purpose of the qualification is to gain knowledge and skills across a broader vocation, rather than achieving specific occupational competence. Qualifications with an overlap in content, but a distinct purpose, may also have a range of assessment methods. The assessment methods utilised in many AGQs are similar to those a student will encounter on many level 4-6 programmes at Alliance universities (e.g. a combination of written and/or practical exams, written assignments, projects and presentations). Different sizes of qualifications that enable a blended qualification route with A Levels, which is not possible with T Levels given the size of the programme, should be eligible for funding. There should be the option for a qualification that overlaps with a T Level to be delivered in regions where there is insufficient employer support for the significant industrial placement element of a T Level.

Question 11: 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

Question 12: Are there other types of qualifications that we should continue to fund to be taken alongside A Levels?

Please see our answer to Questions 6 and 9b on the need for a general vocational option, which can be taken alongside A Levels as a blended qualification offer.

Question 16: What additional support might students need to achieve the new high-quality offer at Level 3?

To ensure as many students as possible achieve at level 3, a set of general vocational qualifications in a range of subjects and sizes should be retained. The T Level Transition Programme is a positive development, but for the reasons outlined in earlier questions, the two groups of qualifications set out in the consultation will not meet the needs of all students. We are not confident that other effective mitigations will be found for the potential

disproportionate impact of these proposals on achievement and participation of students with an SEN or Asian and black ethnic background¹.

We are concerned about the impact on adult learners of retaining level 2 Maths and English as part of the requirements for the achievement of T Levels for this cohort. This can be a significant hurdle for adult learners, particularly if there has been substantial gap since prior formal education, even if they are proving to be functionally literate/numerate in their working environment. This issue will likely be exacerbated by the recent updates to the level 2 curriculum, particularly in Maths.

We agree it is vital that students receive the right information, advice, and guidance. Access to impartial career education information, advice and guidance should be part of all study programmes and entry points from Key Stage 3 onwards. To ensure learners can see how qualifications fit into potential career pathways and to help encourage programmes to be structured to support transition, there needs to be clear progression mapping from each technical qualification built on to the occupational maps.

Question 20: 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

Question 31: What support is needed to smooth the implementation of the proposed reforms?

We urge the government to reconsider the pace of these reforms. The current timetable does not allow for informed decision making based on evidence of T Levels uptake, attainment, progression and widening participation, and the impact on progression and attainment of the new Regulated Qualifications Framework Level 3 qualifications.

The lack of capacity in some sectors and regions for the required amount of industry experience may prove a limiting factor to growth for T Levels. To help address this, the government should increase capital funding to encourage industry to host students for the placement element of T Levels. This funding is especially important when industry may be struggling to recover from the effects of repeated economic shocks caused by the pandemic, meaning hosting students is not a priority.

We see value in funding a third category of general vocational qualifications as a permanent feature of the landscape, but irrespective of this, removing alternative qualifications without ensuring sufficient employer capacity is in place for successful delivery of T Levels could have a

¹ 2020. DfE impact assessment for the Review of post-16 qualifications at level 3 in England: second stage consultation

detrimental effect on the life choices of young people, artificially limiting and restricting access to career pathways.

While we understand not all schools and colleges offer every level 3 qualification currently available, there should be an assessment of whether these reforms will limit choices and progression opportunities for students (particularly those from disadvantaged groups) based on where they live. This can only be done effectively once all four waves of T Levels have been rolled out. For example, there is currently only one post-16 provider in the West Midlands offering one T Level from September 2020, and only 5 post-16 providers in the West Midlands offering T Levels from September 2021. There are currently no post-16 providers in Coventry planning to offer T Levels until at least 2022. The Social Market Foundation found a “North – South divide” in the type of level 3 qualifications students undertake prior to attending university. Their analysis in 2018 showed the largest proportion of students accepted to university holding a BTEC qualification only, or a BTEC combined with an A-Level, came from the northern regions and the West Midlands². In addition, many HEIs are seeing an increase in the proportion of commuter students they now recruit, and analysis from The Sutton Trust shows students from disadvantaged groups are much more likely to be living at home and studying locally³.

² 2018. Vocation, Vocation, Vocation. The Social Market Foundation.

³ 2018. Home and Away. The Sutton Trust and the University of Bath.