

# **University Alliance response to the Post-16 Level 3 and Below Pathways consultation**

## **Summary**

We broadly welcome the introduction of a third revised pathway at level 3, including the recognition that each V Level subject will need to have currency with higher education providers. Applied General Qualifications such as BTECs have been an important lever for upward mobility and widening access to higher education, which we hope to see replicated through V Levels.

However, it is vital that the government pauses the defunding of diploma and extended diploma sized AGQs until V Levels are available and can be scaled alongside T Levels to meet growing demand and the needs of all types of learners. V Levels should also be available in larger qualification sizes in some subjects. Without these changes, we are concerned that progression to certain higher education destinations and professions could be affected and there will be a disproportionate impact on some groups of students (such as students who: lack a choice of post-16 provision within a commutable distance; are aged 19-24; are from disadvantaged backgrounds; have Special Educational Needs and Disabilities).

In our response we call on the government to:

- Pause the defunding of diploma and extended diploma sized AQGs until V Levels are available.
- Allow some V Levels in large qualification sizes to ensure existing successful qualifications can be retained.
- Keep students' progression pathways at the centre, including by securing UCAS recognition of V Levels as quickly as possible and involving HE providers at an early stage in developing the outline content, 'rules of combination' and IAG on V Levels.
- Accelerate plans to remove duplication from the regulatory system that governs the approval of technical qualifications.
- Ensure the pace of reform matches the capacity and readiness within the system to design and implement V Levels and expand the range and availability of T Levels.
- Address systemic funding challenges to ensure the post-16 system can accommodate growing demand, effectively deliver the skills the UK needs and support students from all backgrounds to thrive.

## **Consultation questions**

**We are proposing V Levels will be 360 GLH to enable students to combine them with other V Levels and A levels. Where larger subjects are needed, we propose that these are offered through T Levels. In taking this approach, are there any risks or issues we need to be aware of?**

**We broadly welcome the introduction of a third revised pathway at level 3**, including the recognition that each V Level subject "will need to have currency with higher education providers". Applied General Qualifications (AGQs) such as BTECs have provided an important lever for upward mobility and widening access to higher education, which we hope to see replicated through V Levels. Of the 29,020 18-year-old students entering higher education from the lowest participation neighbourhood quintile in 2020, 30% entered with either BTECs or a combination of A-Levels and BTECs. The percentage of these students entering HE with these qualifications has fluctuated between 25 and 30% since 2011. Of white working-class students that enter university, 44% studied at least one BTEC qualification and 37% of Black students entering university do so with only BTEC qualifications. Research has also shown that BTECs deliver some of the best employment,

progression and wage outcomes out of the vocational qualifications in the UK. Our universities will work closely with the Department for Education (DfE), Skills England, and their local partners to help make a success of V Levels and ensure they support progression to further study.

**However, it is vital the government pauses the defunding of diploma and extended diploma sized AGQs until V Levels are available.** University Alliance has been part of the Protect Student Choice (PSC) campaign coalition (led by the Sixth Form Colleges Association) since its inception, and we remain extremely concerned about impact of defunding existing qualifications. In July 2025, the PSC campaign published [a report](#) highlighting that if the government bans AGQs such as BTECs in subjects where T Levels are available, it will open a qualifications gap that tens of thousands of students will be at risk of falling through if they are left without a suitable post-16 pathway.

**As professional and technical universities we are deeply concerned that a gap in suitable post-16 pathways will appear this year, impacting progression to higher education for a range of students and the skills pipeline to priority occupations.** For example, Alliance universities educate a third of all nursing students in England and a considerable proportion of allied health professionals and healthcare degree apprentices. [Around 20%](#) of entrants to nursing degrees hold a BTEC Level 3 National qualification. The PSC campaign estimates there could be 52,000 fewer young people studying Health and Science courses each year, a reduction of 45%, if existing AQGs are banned. The Chief Executive of Care England [recently said](#) that “qualifications like the diploma and extended diploma in Health and Social Care are highly valued by providers of adult social care in England” and warned that “scrapping these qualifications would close off a well-established pathway to entering the profession and exacerbate the workforce crisis in the care sector”. [NHS Employers](#) has previously said this would amount to “depriving the health service of a pipeline of fresh nursing, midwifery and other healthcare recruits”. [Members of the Curriculum and Assessment Review have highlighted](#) social care as an example of where some routes to higher education or employment benefit from larger qualifications that offer a holistic approach and serve to reduce unnecessary repetition of common topics.

The aim of the blanket defunding of diplomas and extended diploma sized AGQs in T Level subjects is to direct students away from AGQs to T Levels. Yet the [Education Policy Institute](#) found that outcomes for T Level students vary considerably by pathway. They highlight that the Digital pathway “appears to be performing relatively well”, whereas the Health and Science and Education and Early Years pathways have seen “high rates of withdrawal, worse level 3 attainment outcomes and worse outcomes for students that do withdraw”. Nearly one in three students doing a T Level in health and science drop out in their first year. As [NCFE](#) has pointed out, “September [2025] marked the fifth year the health T Level has been available, and most providers choose to run a level 3 health and social care extended diploma alongside it to ensure they have pathways suitable for all types of learners”.

**The Curriculum and Assessment Review (CAR) final report said “until V Levels are introduced, we recommend that existing qualifications with strong destination outcomes remain in the system to minimise disruption”.** Whilst we are sceptical of the conclusion of the CAR that “medium (nested or standalone) qualifications are unlikely to be needed in the future landscape”, we are more concerned about the impact of cherry-picking their recommendations on the design of V Levels. The defunding of diploma and extended diploma sized AQGs should be paused until V Levels are available, in line with the CAR recommendation and their advice that “given the scale of the present offer and the apparent use for access...the Government carefully considers the landscape and models impacts before any removal”.

**By allowing some V Levels in large qualification sizes, existing successful qualifications could be retained** with minor changes where required to support their approval as V Levels. We are concerned that in addition to defunding existing qualifications

before V Levels are available, the government has ignored another CAR recommendation on the “need for V Levels in large qualification sizes in some vocational and creative areas where there are no T Levels”. They also advised the government should consult on “opportunities for awarding organisations to build on existing high-performing qualifications... so that the benefits of strong existing offers can be maintained”.

Separately, [members of the CAR](#) have argued that for disciplines such as art and sport, larger qualifications will remain essential on the basis that “subject experts in these areas need to have the ability to sequence learning around skill development and creative progression” and that “larger qualifications enable teachers to plan and integrate learning effectively, promoting deeper understanding and better progression”. 93% of UAL Level 3 Extended Diploma learners that apply to higher education each year receive an offer of a university place, and we share many of the [concerns raised by UAL Awarding Body](#) about the impact of the government’s approach on learners who thrive in practical, project-based, and portfolio-driven environments. Sport is a [commonly chosen](#) degree subject by white boys. Many HE providers also [use sport as an outreach activity](#) to generate interest in higher education for white working class boys, who are significantly underrepresented at this level. Of white working-class students that enter university, [44%](#) studied at least one BTEC qualification.

**The implementation timeline for V Levels is highly ambitious and the pace of this transition is a concern.** If there are delays to the stated timeframe (as there have been with the rollout of some T Levels), the defunding of AGQs in 2026 and 2027 will impact additional cohorts of prospective learners. Another concern we have about the proposed timescales is whether plans to streamline processes between Skills England, Ofqual and the DfE can be achieved at the same pace. The [report](#) on the exercise of the Secretary of State’s relevant functions pursuant to the IfATE (Transfer of Functions etc) Act 2025 found the current tripartite system in approving technical qualifications is “complex, duplicative, and not as responsive as it could be to industry needs”. The [Post-16 White Paper](#) promises to “remove duplication from the regulatory system that governs the approval of technical qualifications, making sure that activities sit within the appropriate organisations, promoting agility whilst maintaining quality” but does not provide a timeframe for achieving this.

The government must be confident that the capacity and readiness exist within the system to implement and scale V Levels whilst also expanding the range and availability of T Levels. There were 41,589 students studying a T Level in 2025, compared with 277,380 learners enrolled on at least one level 3 vocational qualification in the 2024/25 academic year. T Levels and V Levels will need to scale rapidly to absorb a cohort nearly seven times larger than the current T Level uptake. The DfE [estimates](#) that just 91,200 students will be studying a T Level in 2027 (the last year in which diploma and extended diploma sized AGQs will be funded), which was described by the National Audit Office as “optimistic”.

**These reforms are not taking place within a vacuum and systemic funding challenges will hamper the ability of post-16 and HE providers to absorb them.** The [Institute for Fiscal Studies](#) (IFS) estimated college funding per student in 2024/25 was about 11% lower in real terms than in 2010 and school sixth-form funding per student about 23% lower. They also expected average college teacher pay to be about 18% lower than for school teachers in 2025, likely connected to the high exit rates amongst college teachers (16% are leaving their jobs each year). If these persistent issues prevent post-16 providers meeting demand from the growing student population (expected by to grow by 5% between 2024- 2028), it could exacerbate the crisis of young people not in education, employment or training (NEET), cap labour market outcomes, and narrow pathways to higher education.

Universities now lose £1.7 billion each year on teaching UK students and £6.2 billion on undertaking research. Universities UK [estimates](#) the net financial impact of recent government policy decisions will be a £2.5 billion reduction in funding to higher education providers in England across academic years 2024-25 to 2026-27. Post-92 universities are

engines of social mobility, providing a disproportionate share of HE opportunities for UK students from the lowest-income backgrounds, but they are also facing specific financial and recruitment pressures in addition to the headwinds facing the whole sector. This includes the growing cost of the Teachers' Pension Scheme (TPS) employer contribution rate and increased competition for UK students with [noticeable increases](#) in offer-making from high-tariff institutions. The outreach, collaboration and administrative work needed to respond to post-16 pathway reforms will be challenging at a time of unprecedented pressures on universities.

Pausing the defunding of diploma and extended diploma sized AGQs until V Levels are available would provide schools, colleges and universities with the certainty they need to plan effectively for the future, but chronic funding challenges must be addressed for the post-16 system to effectively deliver the skills the UK needs and support students from all backgrounds to progress and thrive.

### **Are there any particular issues for subjects or students that we need to be aware of as a result of not having medium sized V Levels?**

**There are broad subject areas where there should be further engagement with HE providers and employers to determine whether a lack of multiple small V Levels, or medium and large sized V Levels, could impact progression to certain higher education destinations and professions.** This includes Science, Health and Care Services, Engineering, Digital, and Arts, Craft and Design. For example, we are concerned that there might only be one 360 GLH V Level in Science, as many HE providers require the equivalent of at least two A Levels (such as the Cambridge Technical Diploma in Applied Science) for science-based degrees. It is not yet possible to determine whether the content will be sufficient, or the rules of combination flexible enough, for a student to have the option of pursuing either a biomedical science or health science degree route upon completion of a Science V Level as part of their overall post-16 study programme. [72% of sixth form college students](#) who studied the Diploma in Applied Science (which is due to be defunded in this year) secured a university place in 2024.

**Students that lack a choice of post-16 provision within a commutable distance (such as those living in rural and coastal areas) could be impacted, exacerbating geographic inequalities in HE participation.** The availability of V Levels across regions will be an important factor in supporting progression to higher education. The [FFT Education Datalab highlights](#) that "a lot of schools with sixth form students don't appear to offer any small VTQs, and those that do often offer a very limited range of subjects compared to colleges". Using the National Pupil Database (NPD) data from the KS5 student and exam tables from 2023/24, they found the majority of schools with Key Stage 5 students didn't have any students entered for small VTQs and those that did had entries in a very limited number of subjects (the majority had just one).

**Students at risk of falling through the qualifications gap includes those aged over 19.** Those aged over 21 will also not benefit from the narrow age-range for the government's Youth Guarantee, exacerbating the risk that they could join the growing number of young people who are NEET, which is already [12.2% of people](#) aged 16 to 24 years. The [OECD](#) has noted that labour market outcomes for people without upper secondary qualifications (i.e. level 3 or key stage 5) are significantly weaker in the UK than in most other high-income countries. This is just one reason why the government should expand eligibility for the Youth Guarantee to include all 16–24-year-olds, as recommended by the [Education Select Committee](#) in September 2025.

A [higher proportion](#) of BTEC only students and those combining BTECs with other non-A Level qualifications are aged 19-24 or older compared to A Level only students. Mature students make up a third or more of the student population at several Alliance universities. In

the context of the stubborn decline in mature students entering higher education over more than a decade (down 43% since 2012), we are concerned that defunding existing AQGs before V Levels are available will create additional barriers to HE participation. At the very least, the DfE should commit to monitoring and reporting on the impact of defunding AGQ diplomas and extended diplomas for a period that can suitably capture the effects on the number of NEETs in the short-medium term and progression into higher education or skilled employment in the medium-term.

**The effects on students from disadvantaged backgrounds and those with Special Educational Needs and Disabilities (SEND) should be explored further through robust impact modelling.** The CAR found “there is relatively little difference between medium and large applied qualifications in the proportions of students eligible for FSM or SEND”. Given the government’s plan to proceed without adopting the CAR recommendation on the need for some V Levels in large qualification sizes, the DfE should model the difference between medium applied qualifications and T Levels only (versus all large applied qualifications). The CAR also noted that they “did not hear clear-enough evidence on the demographics of the cohort of learners taking ['nested' medium qualifications] to judge fully whether they act as a pathway to widen participation”, but that “anecdotally... this may include learners with SEND or those from socio-economically disadvantaged backgrounds”. The DfE should explore whether clearer evidence can be gathered on this point.

**How could current information, advice and guidance be improved or what new guidelines or measures should be developed to ensure that students are informed about subject selection and combinations?**

**Students' progression pathways must be kept at the centre of designing and implementing V Levels so they know where these qualifications can take them.** This should include securing UCAS recognition as early as possible and ensuring HE providers have plenty of time to familiarise themselves with the content and ‘rules of combination’, so they can factor this in to outreach activity and admissions processes and update their own curriculum if necessary to support the bridging of knowledge and academic skills in the first year of HE study.

**HE providers should be involved at an early stage in developing the proposed ‘rules of combination’.** This will be particularly important for V Levels in subject areas where diploma and extended diploma sized AGQs have been defunded, such as Health and Care Services, Science, Engineering, Digital and Arts, Craft and Design. To avoid confusion, the DfE should formally confirm that the rules of combination will not be in place in 2026 or 2027.

**A clear and consistent message about parity of esteem between V Levels, T Levels and A Levels will be important** to ensure learners feel confident to prioritise how they prefer to learn and their future education and career aspirations when choosing their pathway. We welcome the expectation in the consultation that V Levels will generally have an increased proportion of non-exam assessment compared to many A Levels. [Best practice](#) from AGQs shows high quality and rigorous level 3 qualifications with strong destination outcomes can be delivered through learning and assessment that is more applied. In [our response to the CAR](#), we highlighted that more universities are cutting back on the number of traditional final written exams and introducing more authentic and inclusive assessment such as presentations, research proposals and industry-style reports. A group of University Alliance members have jointly identified the [inclusive assessment attributes](#) that work on a practical basis.

**Clarity on the purpose of V Levels will be important for good information, advice and guidance.** It is not clear at this stage the extent to which V Levels can be linked to occupational standards whilst also providing sufficient breadth to ensure students can move into a variety of destinations. Many people already use the terms “vocational” and “technical” interchangeably and careful consideration should be given to whether the role of

occupational standards is a key part of the IAG provided to students on V Levels if there is a risk of this causing confusion about the level of specialisation and their distinctiveness from T Levels. This is one reason for allowing some V Levels in large qualification sizes, to help differentiate V Levels and T Levels by purpose not just size.

### **What factors should we consider when creating T Levels where there are currently no level 3 occupational standards?**

**The government should allow some V Levels in large qualification sizes.** This would mean existing successful qualifications could be retained, with minor changes where required to support their approval as V Levels, and help ensure V Levels and T Levels are differentiated by purpose, not just size. As [members of the CAR](#) have argued, “while it may be tempting to make all large qualifications T Levels, doing so risks undermining the distinct identity and purpose of T Levels as occupation-specific routes”.

However, if the government proceeds with only allowing large qualifications to be T Levels, they should work with the creative industries to ensure the industry placement element will not be an impediment to learners achieving a full or partial grade in the proposed new T Levels; particularly given the [well documented](#) concerns about the quality and availability of T Level industry placements, which must be achieved alongside one other component to receive tariff points for partial achievement.

**More work is needed to continue reducing the T Level dropout rate** (which was [26% in 2024/25](#) compared to 10% for students studying 3 A Levels and 22% for similar sized AGQs) and the number of students achieving only a partial grade (8.3%, or 1,000 students, in 2024/25). The [Education Policy Institute](#) found that of those who withdraw from T Levels, a large group drop out of education and training altogether, with disadvantaged students most vulnerable to this. Disadvantaged and female students are more likely to not complete their T Levels than students with similar prior attainment and other characteristics. White students are also more likely to withdraw in most pathways.

Whilst it is absolutely right that tariff points have been assigned to “Partially Achieved” T Level grades, this could be of limited value to students depending on their desired higher education destination. This should also be considered in the context of government policy to cut and freeze funding for classroom-based foundation years, which provide an additional year of undergraduate study to support students to access higher education.

### **What steps should we take to ensure the outline content for V Levels, Foundation Certificates and Occupational Certificates is high-quality across subjects and awarding organisations?**

**Whilst consulting on the draft outline content will provide an important guardrail to using Artificial Intelligence to inform the first drafts of content, expert representatives from providers, employers and awarding organisations should be involved at this early stage.** As AI models are mostly limited to using existing published source material and pattern recognition rather than intrinsically understanding the content, provider and employer involvement will be particularly important for ensuring subject content is up to date (as emphasised by the CAR) and will provide durable skills that can be applied in rapidly evolving professions. It will also help ensure the consultation phase is as efficient as possible. As mentioned above, it is not clear at this stage the extent to which V Levels can be linked to occupational standards whilst also providing sufficient breadth to ensure students can move into a variety of destinations. This is a potential tension that will need to be resolved during the development of outline content.

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