



ASSOCIATION
OF COLLEGES

Review of post-16 qualifications at Level 3 and below in England

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The Association of Colleges (AoC) represents nearly 95% of the 251 colleges in England incorporated under the Further and Higher Education Act 1992. Colleges in England educate and train 2.2 million people per year.

AoC supports the aspiration of building a clear, coherent, high quality qualification system. Any reform proposals should serve the interest of students, society and the economy. The change process should build consensus, be carefully paced and ensure that the college sector has the necessary capacity.

We recommend that the next phase of the review should be informed by the 10 key principles we have developed with our members.

We are clear that a 'hard binary' offer at level 3 based only on A Levels or T Levels would not meet the needs of all of the 60% of students in the age cohort who leave school ready for level 3 study.

There needs to be more investment in the 40% of students who are not yet ready for level 3 study at 16 and are the furthest away from progression to level 3 or employment. Programmes at Level 2 and below need to be designed to engage and motivate student and prepare them for progression and/or employment.

We would caution against basing major reforms on evidence which relates to qualifications that are not yet established.

	<p>Principles – purpose and necessity</p>
	<p>The Association of Colleges (AoC) has engaged in this phase of the review at the level of broad principles by proposing 10 key principles to inform the next phase. These attracted substantial support during the consultation period, creating a broad consensus about how the next phase should be approached.</p> <p>AoC’s 10 principles:</p> <ol style="list-style-type: none"> 1. Any change should be in the interests of students, society and the economy and lead to a better offer. The change process should build consensus, be carefully paced and ensure that the sector has the necessary capacity. 2. All qualifications should have a clear purpose, focus on progression with clear lines of sight to employment and/or further study, be of appropriate size and use appropriate assessment methods. 3. The success of a qualification should be judged in terms of improvement in the progression opportunities, skills, knowledge and confidence of students who achieve it. 4. Qualifications should only be withdrawn when a clear replacement is available which is demonstrably more effective in preparing for progression, meeting industry needs and promoting success, inclusion and social mobility. 5. The Level 3 offer should be designed to meet the needs of the full range of learners at this level, whether young people or adults, full time or part time and on academic, technical or apprenticeship routes. 6. The technical route should include qualifications other than T Levels, e.g. in areas such as Sport, Public Service, Performing Arts, Travel and Tourism and be open to students of all ages. 7. Where T Levels are established in a sector or occupation, they should aim to be the full-time technical route of choice for that sector.

	<p>8. The technical route, like the academic route, should allow for shorter qualifications which can be combined or offered with other qualifications and whose content could overlap with T Levels.</p> <p>9. Technical qualifications at Level 2 and below should be of high quality and help prepare students for progression and/or employment.</p> <p>10. High quality Personal and Social Development qualifications should be available for students at all levels and there should be a funded entitlement to a strong common core of Personal and Social Development for all 16 to 18-year-olds.</p>
1	<p>How could we extend this clarity of purpose to all qualifications at Level 3 and below so that the intended outcome for the student is clearer? Please give reasons for your answer, including any examples of how this may be achieved.</p>
	<p>All qualifications should have a clear purpose, focus on progression with clear lines of sight to employment and/or further study, be of appropriate size and use appropriate assessment methods.</p> <p>Qualifications cannot always aim to ‘lead directly to a clearly defined outcome’. High quality qualifications can serve more than one purpose and in practice, the qualification market, the labour market and individual learner journeys cannot provide uniform or linear routes. Young people in particular change their minds about progression routes and intended occupations. Many higher education programmes and job roles, for example, will accept a range of different qualifications as entry requirements.</p> <p>However well designed the system there must be opportunities for young people to change pathway with help and support available to support this. The lack of such opportunities will lead to greater student disengagement and drop out.</p> <p>All study programmes from Key Stage 3 onwards should have a core component of high quality careers education, information, advice and guidance to help young people make fully informed choices about their progression options.</p>
2	<p>Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are</p>

	<p>other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.</p>
	<p>High quality Personal and Social Development (PSD) qualifications should be available for students at all levels and there should be a funded entitlement to a strong common core of Personal and Social Development on all 16 to 19 study programmes with progression between levels, and achievement should be acknowledged and valued. The grading of Personal Development in the new inspection framework also demonstrates the value of this work.</p> <p>High quality PSD qualifications should be available for students at Level 1 and below. Students working at this level have a variety of educational backgrounds; moderate/profound learning difficulties, adverse experiences or disrupted education. All these students can benefit from a focus on PSD and employability skills before embarking on work experience, supported internships and or programmes in technical/ vocational areas. This can form part of a transition programme from school or a college foundation skills programme. Such programmes boost student confidence and self-belief.</p> <p>PSD and employability qualifications can also contribute to NEET intervention/ prevention work. They offer a flexible framework in which to meet varied individual needs within a group setting. Students whose learning experience has been challenging/ disrupted should have the opportunity to achieve a qualification if it is the main qualification they are studying towards. In other situations, stand-alone qualifications may not be necessary and non-accredited options may be more appropriate.</p> <p>67% of qualifications at entry level are based on PSD and employability. Removing such opportunities may have unintended consequences on those who are working at the lowest levels and are more likely to have special educational needs (64% of students on Level 1 and entry level programmes as stated in the consultation document on p.13).</p>
	<p>Principles - progression</p>
<p>3</p>	<p>What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?</p>

The success of a qualification should be judged in terms of improvement in the progression opportunities, skills, knowledge and confidence of students who achieve it.

A key purpose of effective qualifications is to support successful progression to higher level study or employment. Nevertheless, we would advise against designing qualifications focused exclusively on progression to either one or the other. Qualifications can equip students for both. To presume otherwise would limit opportunities for students and exclude many from participation.

Qualifications should not be judged by their students' progression to narrowly specified outcomes. Progression to particular destinations is a function of many factors other than the qualifications achieved. Preparation for progression must start from where students are and acknowledge their different starting points and eventual aims. The availability of high quality Information Advice and Guidance is key to helping students navigate the educational routes on offer.

There needs to be a better understanding of the characteristics of students who drop out of HE and effective strategies that could be implemented to support them. Courses at Level 4 and above are very diverse and require a wide range of different skills and lower retention cannot necessarily be attributed to the qualification students progressed with.

Colleges would expect large numbers of students to continue to progress successfully to HE from academic, technical and apprenticeship routes and Applied level 3 qualifications are often the best preparation for Applied higher education courses. Many vocational qualifications are valued by HE providers as a good preparation for courses at Level 4 and above and have contributed to increasing participation and graduation levels for many students, notably from disadvantaged backgrounds or with relatively low prior achievement.

Applied General Qualifications have been reformed and there is no comprehensive progression data yet available for the reformed qualifications. T Levels do not yet have a track record of progression. It is therefore difficult to draw any valid conclusions about their outcomes based on the outcomes associated with pre-existing qualifications.

4	<p>How could we better use data about student outcomes to monitor and assess the success of future qualifications?</p>
	<p>We need to avoid excessively narrow definitions of outcomes and better understand the relationship between prior achievement and success after progression and what capacities students need for successful progression and further learning. Performance measures need to be reviewed and simplified while also bringing all programmes into scope.</p>
	<p>Principles - quality</p>
5	<p>Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.</p>
	<p>Any change should be in the interests of students, society and the economy and lead to a better offer.</p> <p>The Level 3 offer should be designed to meet the needs of the full range of students at this level, whether on academic, technical or apprenticeship routes. We support these quality features but would caution against interpreting them too narrowly.</p> <p>At level 1 and below, qualifications may not lead directly to employment but can support progression by improving student motivation and engagement.</p>
6	<p>Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.</p>
	<p>Both the technical and academic routes, should be inclusive enough to allow for shorter qualifications which can be combined or offered with other qualifications and whose content could overlap with T Levels. Assessment styles and methods should be appropriate to the needs and purposes of a qualification and support student learning and motivation. Assessing most technical skills requires centre-based or project-based practical assessment.</p>

	<p>The technical route should include qualifications other than T Levels, e.g. in areas such as Sport, Public Service, Performing Arts, Travel and Tourism and be open to students of all ages.</p> <p>Currently, colleges use high quality qualifications in different ways to design 16 to 18 study programmes to meet a student's progression needs. Such programmes can combine smaller 'A Level-sized' vocational courses or A Levels and vocational qualifications. This is often because the student is not set on a specialist occupational path or because the student would benefit from a more diverse programme than simply A Level, Applied or Technical qualifications can offer.</p>
7	<p>Are there particular quality principles that we should consider for adults? Please give reasons for your answer.</p>
	<p>Size and duration are key design features and adults require a more flexible or modular offer due to work or family commitments and other personal circumstances. Post-16 students of all ages should have access to the same qualification options and colleges cannot be expected to run parallel provision in the same sector for adults and young people if this implies unviable group sizes. The ability to accredit prior learning is also particularly appropriate for adults.</p>
	<p>Applying our principles – Our broader ambitions</p>
8	<p>At Level 3, what purposes should qualifications other than T Levels or A Levels serve: a) for 16 to 19-year-olds? Please give reasons for your answer. b) for adults? Please give reasons for your answer.</p>
	<p>Colleges have given a clear message during the consultation that a 'hard binary' approach which offers only A Levels or T Levels would fall short of meeting the needs of all students at level 3 and could throw social inclusion and mobility into reverse.</p> <p>Both routes need to have high status while also being more inclusive and flexible. Vocational programmes which allow for delayed specialisation and include shorter qualifications should be available, either as part of a 'general / academic' route or a 'technical / vocational' route.</p>

Colleges have expressed concern that T Levels will not be able to meet the needs of all students currently studying on Level 3 vocational programmes.

Specific concerns about T Levels include:

- They will not be accessible to all students, especially those with a grade 4/5 GCSE profile or those with caring responsibilities.
- They will be too specialized and occupationally specific for those students who do not have clear career plans.
- They do not provide for the number of career changes which students might experience in their working lives.
- They are too reliant on sufficient and suitable industry placement opportunities which may not be available in every locality.

a) 16 to 19-year-olds

Qualifications other than A Levels or T Levels can also prepare students for progression and contribute to social cohesion and social mobility. Only 60% of students applied to HE with just A Levels. There is a potential impact on social mobility of any change to current qualifications, such as Applied Generals (AGQs). According to UCAS, in the 2018 cycle, 26% of HE applicants applied with AGQs and/or an extended project qualification (EPQ). A further 7% of applicants held a combination of A Levels and smaller AGQs.

We also need to consider those sectors not currently in scope for T Levels, such as Sport, Travel and Tourism, Performing Arts, Music performance and some aspects of Art and Design. These are all major employment sectors of significant value to the UK economy. We need to ensure the quality and sufficiency of the offer in these sectors.

The 'Employer Skills Survey 2015: UK' results showed that in 2015 employment in arts and other services was greater than in construction, agriculture and financial services. In other successful European systems such as Finland¹ and Sweden there are pathways for sport, the arts, and travel and tourism.

Currently 42,600 16 to 18-year-olds study vocational sport qualifications. There are a number of technical roles within this route and we need to consider the potential unintended impacts on sport enrichment of any changes across the 16 to 18 phase. Sport initiatives aimed at enhancing

	<p>leadership skills, self-confidence and mental well-being² may be adversely affected if there is less sport on offer in colleges.</p> <p>We also strongly recommend a review of the work-based routes. Protective services, leading to occupations such as the police and armed services, and social care are both work-based routes. 23,000 16 to 18-year-old students currently study Public Services, 69% of which are males. 46,000 students study health and social care qualifications. It is unlikely that it would be appropriate for 16-year-olds to be able to access work-based routes in either protective services or social care and yet many young people are keen to progress into such employment at 18. On the current courses, students gain transferable skills such as teamwork, confidence, leadership and communication skills, which are all vital to the work place and customer/client focused.</p> <p>Colleges have also expressed concern about the future of the International Baccalaureate Diploma which is an excellent broad-based programme which is highly valued by students, universities and employers. Withdrawal of public funding from the IB would lead it to become the exclusive preserve of the fee-charging sector, with a consequent negative impact on social mobility.</p> <p>b) Adults</p> <p>We also need to consider how to meet the needs of ‘accidental’ adults, ie: those who are 19 when they embark upon Level 3 study. Colleges will not be able to run separate viable adult groups in parallel with T Level groups. The same is true for older adults who wish to return to study at Level 3.</p> <p>The impact of any changes for Access to Higher Education programmes which support adult progression to HE also needs to be considered.</p>
9	<p>How should we determine “overlap” in relation to:</p> <p>a) overlaps with T Levels? Please give reasons for your answer.</p> <p>b) overlaps with A Levels? Please give reasons for your answer.</p>
	<p>If ‘overlap’ is interpreted as the same subject content appearing in different qualifications, this does not undermine quality as long as it contributes to the integrity and coherence of each qualification and enhances students’ access to key content. Qualifications may differ in size</p>

	<p>and smaller qualifications may overlap with larger ones. They may also differ in learning approaches, breadth of content and how the content is presented.</p> <p>Some students respond well and flourish in the context of reading text and producing written work, others to more dialogic, teamwork and practical activity. Different types of qualification may have overlapping content while playing to students' different aptitudes.</p>
10	<p>How could post-16 qualification reform and broader study best support more people to progress directly to Level 3 after key stage 4?</p>
	<p>Direct progression to Level 3 at 16 is generally based on students' GCSE profiles. Colleges set both programme-specific and subject-specific entry requirements to ensure that students are ready to embark on Level 3 study. On average, 40% of students complete Key Stage 4 without five GCSEs including English and maths at grade 4 or above. Colleges need to be consistent in their entry criteria to avoid challenges, barring exceptional circumstances such as young people who have been home educated or ill health having prevented them from sitting their GCSEs.</p> <p>Given that current grade 4+ achievement for GCSE resits is below 30% in English and considerably lower in maths this impacts on progression to Level 3 if after one year of post-16 study a student hasn't achieved a grade 4 in English or maths. This has implications for progression to T Levels which are large, rigorous Level 3 programmes. Students will need every opportunity to pass these critical gateway qualifications and this will require additional time and funding for the transition phase.</p> <p>Once a T Level is established in a sector or occupation, this should become the main full-time technical route for that sector if the wider system (eg: availability of industry placements) can support success. To be successful, T Levels will need to appeal to, and be accessible to, a wide range of students with diverse educational histories and prior achievement.</p> <p>For some students, achieving Level 2 and progressing directly to employment may be appropriate and their qualifications need to meet employer requirements. Other students may wish to use their Level 2 qualifications as a springboard to further study at Level 3.</p>

	<p>Some occupations (such as construction trades, hairdressing and catering) will accept Level 2 as demonstrating skill and readiness for employment. Level 3, at college or as an apprenticeship, offers a supervisory or specialist option for those who wish to continue to study further. T Levels will offer Level 3 study in these subjects and will be designed to include some Level 2 study. This needs to be considered in pathway planning and for the transition framework in order to provide appropriate progression opportunities for students and avoid unnecessary repetition.</p>
11	<p>How could post-16 qualification reform and broader study best support more people to achieve at Level 3?</p>
	<p>Study programmes at Level 2 and below need to be designed to engage and motivate student and prepare them for progression and/or employment. There needs to be more investment in those students who have achieved the least by 16 and are the furthest away from progression to Level 3 or employment. Such programmes need to have a coherent structure with choices built in.</p> <p>Study programmes at Level 3 need to be accessible to the full range of students working at this level, the majority of whom will enter college with a GCSE profile between grade 3 and 6.</p> <p>In order to support more people to achieve Level 3 qualifications, the assessment methodology will need to be appropriate for a wide range of students including those who have not flourished or achieved their potential in an exam-heavy Key Stage 4 context. Assessment needs to be practical and skills-based in order to meet the needs of employers. There need to be frequent windows for assessment re-sit opportunities which do not prevent students from progressing.</p> <p>Not all occupations require Level 3 qualifications. Young people mature and make careers choices at different rates. There should be opportunities for all learners, including adults, to re-enter education; either part time or full time, on a college-based or a work-based route.</p>
12	<p>If Level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice.</p>

	<p>One in five college students are currently on Level 2 programmes. Students have different reasons for being at Level 2. The majority are on study programmes made up of a main vocational/technical qualification and English and maths. Those which provide access to Level 3 could become part of the transition to T Level. For those that provide direct access to employment such as hairdressing, catering and construction trades it is important that qualifications are up-to-date and meet current and anticipated industry requirements for entry to employment for those young people who wish to step out of formal education at this stage.</p>
<p>13</p>	<p>What are the key roles that qualifications at Level 1 and below need to play?</p>
	<p>18% of students in colleges are on study programmes at Level 1 and below. Qualifications at Level 1 and below have a variety of roles:</p> <ul style="list-style-type: none"> • Motivating and re-engaging; supporting students to re-commit to their education and training and providing opportunities for achievement and success. • Being flexible enough to meet the needs of students who have had disrupted education or were at risk of not remaining in education or employment, acting as a 'hook' into further study and providing a framework which can meet the needs of a variety of students. • Providing a vocationally-specific foundation e.g. in construction trades, catering and hair and beauty. • They meet the needs of students, often with moderate or profound learning difficulties, to prepare for independent living, supported internships or appropriate employment opportunities. These qualifications often focus on employability and PSD. <p>In a qualification-driven context, it is as important for students working at level 1 and below to have the opportunity to achieve the recognition which a qualification provides, as it is for their peers working towards Level 2 or Level 3 qualifications.</p>
<p>14</p>	<p>Are there additional principles we should apply to Level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.</p>
	<p>Students who are working at Level 1 and below are furthest away from employment and successful progression. Their study programmes should include PSD, careers education, information, advice and guidance,</p>

	<p>opportunities to boost confidence, self-esteem, build social capital, aspirations and broaden horizons. They should also include elements of citizenship and the gateway skills of English and maths at levels appropriate to students' starting points.</p> <p>Programmes at Level 1 and below need to maintain their breadth and appeal to students who, by definition, have mixed experience of education before this point; some will have had disrupted education, for others Level 1 is aspirational.</p> <p>These programmes need to start from a person-centred approach to motivating students, assessing and recording progress and can draw on the best college practice in recognizing and recording progress and achievement (RARPA).</p>
	<p>Securing early progress</p>
15	<p>Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer.</p>
	<p>Qualifications should only be withdrawn when a clear replacement is available which is demonstrably more effective in preparing for progression, meeting industry needs and promoting success, inclusion and social mobility.</p> <p>The withdrawal of funding for all registrations on pre-existing qualifications from August 2020 could have serious unintended consequences. Many colleges place first year students on 'nested' one-year qualifications and register them to 'top up' in the second year, once their commitment and achievement are secure. When funding is withdrawn, the final cohort should have all the same accreditation and retake opportunities as their predecessors and not be disadvantaged in any way. This is an urgent question in relation to candidates starting pre-existing Applied General and Tech. qualifications in 2019/19 and seeking to 'top up' in the 2020/21 academic year and we have raised this with the Department.</p> <p>The equality impact assessment takes into consideration the perspectives of students, employers and providers. It notes that some students may become NEET and sees this as impacting on lower level students in the</p>

	<p>main. However, colleges have recent experience of students failing to achieve on new Applied General qualifications where they would have achieved on the pre-existing qualifications, because of new external assessments and this has implications for social inclusion and mobility.</p> <p>Change could also have implications for students for whom English is an Additional Language (EAL) who may be seeking to progress to Level 3 programmes, whether academic or technical, after an intensive ESOL programme.</p>
16	Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.
	Yes, if a qualification has had no enrolments for two years it could be considered redundant.
17	Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer.
	No.
18	Do you agree we should consider removing approval for funding from qualifications with low enrolments? Please give reasons for your answer.
	Yes, this should be considered unless there is an impact on 'niche' qualifications which are needed by specific small employment sectors. These qualifications should be reviewed on a case by case basis.
19	Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.
	Some 'niche' qualifications may need to be retained (see 18 above). Short qualifications which are options within a larger suite of qualifications may also need to be retained to maintain the choice required by the qualification suite.
	Shaping the next stages of the review
20	Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND or others with a

	protected characteristic under the Equality Act 2010? Please give reasons for your answer.
	Qualifications with substantial entries should only be withdrawn when a clear replacement is available which is demonstrably more effective in preparing for progression, promoting success, inclusion and social mobility.
21	Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation? Please give details of any additional impacts below.
	<p>The impact assessment refers to the cost of change for providers, but not to the impact of repeated, consecutive changes from pre-existing to new and then potentially from new to T Levels. This will be challenging for providers at a time of serious financial pressure and has major workload and morale implications for their staff.</p> <p>The post 16 system is inclusive and promotes social cohesion and mobility by providing opportunities for a wide range of students. Not to do so could see an increase in the number of students not in Education, Employment or Training (NEET). Colleges are very committed to 'getting it right' for our learners but the wrong kind of system change can create a risk to our students of 'not getting it right' and jeopardizing their achievement and progression opportunities. This can have serious economic and human costs.</p> <p>Consideration needs to be given to the impact of withdrawing some qualifications on the ability of a provider to deliver other qualifications. For example, withdrawing qualifications in sport, public services and performing arts could impact so negatively on the viability of a college that it might need to stop providing other qualifications.</p>

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