



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 93% of the 266 colleges in England incorporated under the Further and Higher Education Act 1992.

AoC draft response

(v.3 24/04/19)

	Principles – purpose and necessity
1	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>All qualifications should have a clear purpose, be well designed, prepare effectively for progression with clear lines of sight to employment and/or further study, be of appropriate size and use appropriate assessment methods.</p> <p>We would question the idea that they should always aim to ‘lead directly to a clearly defined outcome’. 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.</p> <p>However well designed the system there must be opportunities for young people to change path with help and support available to enable this in order to prevent disengagement or drop out. All study programme from Key Stage 3 onwards should have a core component of careers education, information, advice and guidance to help young people make more informed choices about progression pathways.</p>
2	Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are 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>There should be a funded entitlement to a strong common core of Personal and Social Development (PSD) for all 16-18-year-olds on all programmes. This should be an important element of all 16 to 19 study programmes with progression between levels and achievement should be acknowledged and valued.</p>

	<p>High quality PSD qualifications should be available for students at Level 1 and below. These can meet the needs of students with moderate/profound learning difficulties who 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 special school or a college foundation skills programme. Such programmes boost student confidence and self-belief.</p> <p>PSD and employability qualifications can also be beneficial for NEET intervention/ prevention work. They offer a flexible framework in which to meet varied individual needs within a group setting.</p> <p>As the consultation document outlines on page 17, 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>Students whose learning experience has been challenging/ disrupted should have the opportunity to achieve a qualification if it is the main qualification the are studying towards. In other situations, stand-alone qualifications may not be necessary.</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>
	<p>The success of a qualification should be judged in terms of the improvement in 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. However, 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 could limit opportunities for students.</p> <p>We do not believe that qualifications should be judged by their students' progression to specific outcomes. Progression to particular destinations is a function of many factors other than the qualifications achieved.</p>

	<p>Applied General Qualifications are valued by HE providers as a good preparation for many 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. <i>(Data needed)</i></p> <p>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.</p>
4	How could we better use data about student outcomes to monitor and assess the success of future qualifications?
	<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 more programmes into scope. <i>(more...)</i></p>
	Principles - quality
5	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>The Level 3 offer should be designed to meet the needs of the full range of 16 to 18-year-olds at this level, whether on academic, technical or apprenticeship routes. We support these principles but would caution against interpreting them too narrowly. <i>(more...)</i></p>
6	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>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. Assessment styles and methods should be appropriate to the needs and purposes of a qualification and support student learning and motivation.</p> <p>Currently colleges use high quality qualifications in different ways to make up a 16 to 18 Study Programme to meet a student's progression needs. Such programmes can combine smaller vocational programmes or A Levels and vocational qualifications. This is often because the student is not set on a specialist career 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, including for programmes designed for adults. Adults often require a more flexible offer due to family, work or personal circumstances. The opportunity for accreditation of prior learning is also particularly important 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:</p> <p>a) for 16 to 19-year-olds? Please give reasons for your answer.</p> <p>b) for adults? Please give reasons for your answer.</p>
	<p>a) 16 to 19-year-olds</p> <p>Qualifications other than A Levels or T Levels should 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 other qualifications in the current market such as Applied Generals (AGQs). In the 2018 cycle¹, 26% of HE applicants applied with Applied General Qualifications (AGQs) and/or extended projects. A further 7% of applicants held a combination of A Levels and smaller AGQs. <i>(check data)</i></p> <p>We also need to consider those sectors not in scope for T Levels, such as Sport, Travel and Tourism, Performing Arts, Music performance and</p>

¹ <https://www.ucas.com/file/198496/download?token=aCOhfgUC>

some Art and Design qualifications. These are all major employment sectors of significant value to the UK economy. We need to ensure 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 Finland² and Sweden³ there are pathways for sport, the arts, and travel and tourism.

Currently 42,600 16 to 18-year-olds⁴ 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 leadership skills, self-confidence and mental well-being⁵ may be adversely affected if there is less sport on offer in colleges.

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 students⁶ currently study Public Services, 69% of which are males. 46,000 students⁷ 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 course's students gain transferable skills such as teamwork, confidence, leadership and communication skills, which are all vital to the work place and customer/client focused. *(update data)*

b) Adults

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 using existing qualifications in

² <http://ncee.org/what-we-do/center-on-international-education-benchmarking/top-performing-countries/finland-overview/finland-school-to-work-transition>

³ <http://www.cedefop.europa.eu/en/publications-and-resources/publications/5198>

⁴ IIR/Mides data

⁵ <https://www.sportengland.org/funding/tackling-inactivity-in-colleges/>

⁶ ILR/Mides data

⁷ ILR/Mides data

	parallel with T Level groups. The same is true for older adults who wish to return to study at Level 3.
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>Overlap can be interpreted as the same subject content appearing in different qualifications. This should not be a problem if the content has integrity and coherence and enhances student access to the content. Qualifications may differ in size and smaller qualifications may overlap with larger ones. They may also differ in learning approaches, breadth of content and how the content is presented. Some young people 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 and play to students’ different strengths.</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 upon Level 3 study. On average, 40% of students complete Key Stage 4 without five GCSEs including English and maths at grade 4 or above (<i>check data</i>). 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 resist 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. To be</p>

	<p>successful, T Levels will need to appeal to a wide range of students with diverse educational histories.</p> <p>For some students achieving Level 2 and entering work may be appropriate and meet employer requirements. For others they may decide that they wish to continue onto Level 3.</p> <p>Some occupations (such as construction trades, hairdressing and catering) will accept Level 2, or possibly Level 1, to establish skill and readiness for employment. Level 3 offers a supervisory or specialist option for those who wish to continue to study further. It can be taken at college or as an apprenticeship. 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.</p>
11	<p>How could post-16 qualification reform and broader study best support more people to achieve at Level 3?</p>
	<p>The transition phase should include high quality technical qualifications at Level 2 to help prepare students for progression and/or employment. 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 needs to be frequent windows of opportunity to re-sit assessments in ways which do not prevent students from progressing.</p> <p>Not all occupations outlined in the T Level occupational maps, require Level 3 qualifications. Young people mature and make careers choices at different rates. There should be opportunities to re-enter education; either part time, full time or as an apprentice.</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. The majority of these 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</p>

	<p>and construction trades it is important that qualifications meet industry requirements for entry to employment for those young people who wish to step out of formal education at this stage.</p> <p>Conversely consideration needs to be given to ensuring that there are opportunities for young people to move onto further study from a Level 2 programme. The opportunity for accelerated progression to a T Level for students who have achieved a Level 2 in a trade needs to be considered.</p>
13	<p>What are the key roles that qualifications at Level 1 and below need to play?</p>
	<p>Currently 16 to 18 x% of students in colleges are on study programmes at Level 1 and below (<i>check data</i>). Qualifications at Level 1 and below have a variety of roles:</p> <ul style="list-style-type: none"> • They meet the needs of students, often with moderate/profound learning difficulties, to prepare for independent living, supported internships or appropriate employment opportunities. These qualifications often focus on employability and PSD. • They meet the needs of students who have had disrupted education or were at risk of NEET, that is they are a ‘hook’ into further study and provide a flexible framework in which to meet the needs of a variety of students. • They provide a vocationally-specific foundation e.g. in construction trades, hair and beauty and catering. <p>In a qualification-driven context, it is as important for lower level students to have the opportunity to achieve a qualification as it is for their peers working towards GCSEs, A Levels and T Levels.</p>
14	<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, 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>

	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.
	Securing early progress
15	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>The equality impact assessment takes into consideration the perspectives of students, employers and providers. It notes that some students may become NEET, but, sees this as impacting on lower level students in the main. However, colleges already have experience of students failing to achieve on new qualifications where they would have achieved on the pre-existing qualifications, because of new external assessments. Some colleges have moved back to pre-existing qualifications for this reason.</p> <p>The impact assessment makes reference 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 and has major workload and morale implications for their staff.</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. These qualifications should be considered 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).
	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.
	The post 16 system is inclusive and promotes social cohesion and mobility by provide opportunities for a wide range of students. Not to do so would see an increase in NEET. Consideration needs to be given to the impact of withdrawing qualifications on the viability of an organisation to deliver other qualifications which are still available. For example, withdrawing qualifications in sport, public services and performing arts could impact so negatively on an organisation that it can no longer provide other qualifications.

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