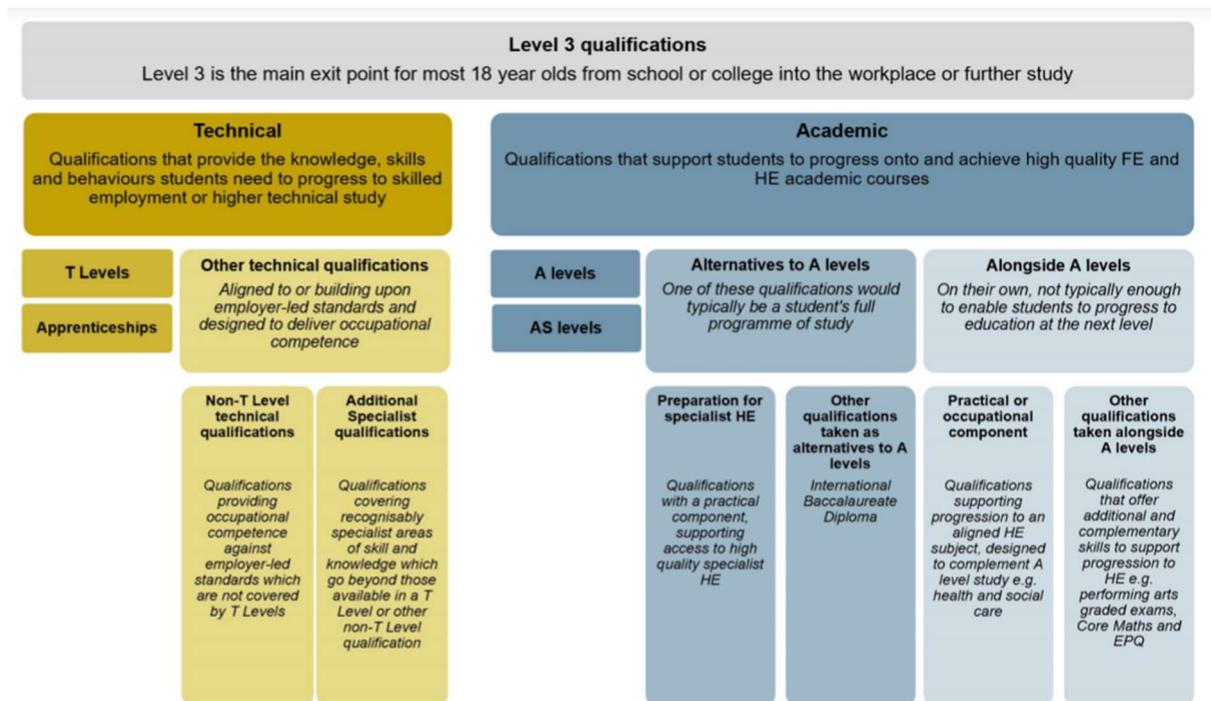


Commentary for HE institutions on the DfE Review of Post-16 Qualifications at Level 3: 2nd Stage

The Department for Education has published the second stage of its consultation on its [Review of Post-16 Qualifications at Level 3](#). The proposals in the consultation are that profound changes should be made to the level 3 qualifications landscape and so it is important that as many institutions as possible respond to ensure that any changes made are appropriate.

1. Introduction

In the first consultation, the DfE indicated that they wanted “T Levels and A Levels to become the qualifications of choice for 16 to 19 year olds taking level 3 classroom based qualifications”. In these new proposals, the message is still essentially the same with the addition of very small numbers of qualifications in a very small number of areas. The following figure shows the landscape that they are proposing for 16-19 year old students.



There is still a binary structure with two pathways.

a) The Technical Pathway

This is to be populated mainly by T Levels. The additional qualifications in this pathways are:

- i. **Non-T Level technical qualifications** – these are competence-based qualifications and so will be occupational qualifications.
- ii. **Additional specialist qualifications** – smaller qualifications which lead to skilled employment and build on subset of content of level 3 employer-led standards in greater depth; however, T Levels are very large qualifications and so very few students are likely to be able to take an additional qualification to their T Level programme.

b) The Academic Pathway

This is to be populated mainly by AS and A Levels. There are two types of additional qualifications that may be taken in this pathway:

- i. **Alternatives to A Levels** – these are large qualifications making up a whole study programme and they fall into two sub-groups:
 - Qualifications with a practical component supporting access to specialist HE programmes. The only examples that they give are performing arts and sport. They explicitly state that they will **not** fund any large qualifications that (a) overlap with T Levels, such as IT and science, or (b) any qualifications that are applied or alternative versions of A Levels.
 - Qualifications currently offered as alternatives to A Levels such as the International Baccalaureate Diploma.
- ii. **Qualifications to be taken alongside A Levels**
 - Qualifications supporting progression to an aligned HE programme. The suggestions are: health and social care, taken alongside A Levels in Biology and Sociology to support progression to Nursing; engineering, taken alongside A Levels in Maths and Physics to support progression to Engineering; performing arts and creative arts to add breadth and/or depth of practical or performance skills. They will **not** be funding qualifications in subjects that have an A Level. They give Business and Science as examples of these, but presumably they could include IT and Computing as well.
 - Qualifications supporting general progression to HE, including performing arts graded qualifications, Core Maths and the Extended Project Qualification.

You will see that these proposals will lead to the removal of funding from most of the existing vocational qualifications, like the BTEC Nationals. The proposals will have a different impact on different sectors, largely dependent on whether there is an overlapping A Level and/or T Level.

It is our contention that vocational qualifications like the BTEC Nationals have a different purpose to that of A Levels and T Levels. That is why we are advocating a third category, **general vocational qualifications**, to be funded.

This is even more significant in light of the recent withdrawal of Applied A Levels and reduction in A Level subject areas (e.g. discontinuation of the A Level in Human Biology, which some students opted for when wanting to progress to nursing).

2. The purpose of this commentary

We appreciate that you are very busy and that the completion of consultation responses is very time-consuming. The purpose of this commentary is to help to support you in this as follows:

- Providing our general observations on and concerns about the proposals made in the review, and identifying aspects where there is ambiguity or that lack clarity
- Identifying the questions that may be most relevant to HE institutions

Different people within your institution, e.g. those from admissions, recruitment, outreach and academics, may have a different perspective to bring to the response and so **please share this with your colleagues**. You could collaborate on a joint response but it is perfectly acceptable for your institution to submit more than one response. In particular, your academic colleagues in sectors likely to be most affected by the proposals may wish to provide a response.

3. Our general observations on the proposals

We welcome the government's continued commitment to an education system that provides high-quality options that support individuals to fulfil their potential and meet the needs of employers. However, we have the following concerns about their latest proposals.

- **A binary choice of technical and academic routes.** The proposals continue to set out a binary choice between a technical/occupational and an academic route at 16-19, albeit with the addition of a small amount of flexibility under the academic route. We find it inappropriate to make such a strict demarcation between the routes. We note that all higher education institutions have strong links to industry and many undergraduate degree programmes have professional body accreditations. You may therefore not necessarily regard those degree programmes as being purely academic.
- **Mainly a choice between A Levels and T Levels.** The proposed offer continues to be largely a choice between A Levels and T Levels, severely narrowing the breadth of post-16 options, limiting choice, and not supporting the diverse needs and ambitions of all individuals (and student groups) at age 16 and above.
- **The need for a third general vocational option.** T Levels are ideal for those ready to choose a path to a specific occupation at age 16, but will not support individuals who are uncertain about what they want to do and want to explore a general vocational route first. Students should have the choice at 16 to take a general vocational option that allows them to defer specialisation and develop the broad base of knowledge, technical and transferable skills for a career pathway, which **keeps their progression options open** and take qualifications that may lead to **either** employment or higher education.
- **Possible issue for those wanting a T Level.** There will also be students wishing to take a T Level but who have no appropriate work placement available in their area. With only T Levels and A Levels on offer, those students would be forced to take A Levels.
- **The need for a full blended qualifications offer.** For those uncertain of their eventual progression pathway, the current availability of general vocational qualifications in a range of subject areas and sizes to be taken alongside A levels allows students to keep their options open by developing a broad range of knowledge, together with technical and transferable skills. The new proposals mean the offer for students wanting to take vocational qualifications alongside A levels will be very limited.
- **The role of modes of assessment in skills development.** Most A Levels are assessed 100% by written exams; some have 70/80% written exams; while a very small number have 50% or less assessed by written exams. The current reformed vocational qualifications usually have around 30-40% assessment by written examinations and this seems to reflect more the schemes of assessment of undergraduate degree programmes, particularly those in the more applied subject areas. The remaining 60-70% may include assignments, projects, practical tasks and presentations, and this facilitates the development of a broader range of skills.
- **Current progression to HE by vocational students.** Our own data on BTEC Nationals shows that around half of the students taking them progress to higher education degree programmes. Around two-thirds of them have taken a BTEC on its own and one-third a BTEC/A Level mix. So the current general vocational qualifications meets their needs.
- **It does not reflect the reformed vocational qualifications.** Applied General Qualifications (including the BTEC Nationals), meeting new DfE criteria, were phased in from 2016. Following the withdrawal of most QCF versions, from 2020/21, the vast majority of students

will be taking the reformed versions and therefore from 2022, most BTEC entrants to higher education will have taken the reformed version. It is our view that these RQF qualifications will prepare students very well for progression to HE and lead to improved outcomes.

- **The possible impact of DfE proposals on widening participation in HE.** The provision of general vocational qualifications has helped to support widening participation in higher education. These qualifications have engaged students and enabled them to achieve success. This has encouraged them to continue with their education and given them the confidence to progress to the next level. For those entering HE in 2017, 41% of students taking a BTEC only came from the lower four socio-economic groups, compared to 20% taking A Level only. Similarly, 39% of students taking BTEC only came from BAME backgrounds compared to 24% taking A Level only. The average cohort profile of those taking BTEC (whether stand-alone or alongside A Levels) is more diverse and representative of the student population than the average cohort profile of those studying a purely A Level route. The [DfE's own impact assessment](#) accompanying the consultation indicates that, as a result of its proposals, "*HE providers could find a reduction in the number of applicants to study*" (See page 12 para 47), and that specific student groups may be more adversely affected by the proposals (including males, those with SEN, or from an ethnic minority background, or those from certain socio-economic groups). Our concern is that the impact could be greater than the DfE predicts as the restricted offer in the new landscape would not be engaging for all students or meet all their needs.

Some questions in the consultation propose the removal of funding for qualifications that overlap with T Levels while others propose the removal of funding for qualifications that overlap with A Levels. As the new landscape is to consist mainly of A Levels and T Levels, we can only infer that the DfE regards qualifications such as the BTEC Nationals as overlapping with one or other of these two, but it does not make it clear which. It is our view that the general vocational qualifications like the BTEC Nationals serve a different purpose from A Levels and T Levels and do not overlap with either category. In order to ensure that the third category of general vocational qualifications is not removed, we will be stating that they should be retained when responding to questions about **both the technical and academic pathways**.

4. Consultation questions

You may wish to respond to the whole consultation. However, if you do not have the time to do so, we suggest that **questions 6-15 in Chapter 2** are the most relevant to higher education institutions. That said, **questions 19 and 20 in Chapter 4** will be of interest to you as they refer to the **Access to HE Diploma**, although the DfE is not proposing any changes in the case of that qualification. Also, you may wish to respond to questions **26-27 and 29-30 in Chapter 5**, which ask for your views on the overall proposal reforms for technical and academic qualifications.

The text that we have added to each of the questions flags up our concerns about the proposals. It would be helpful in your response to give your own experience of recruitment of students who have taken Applied General Qualifications, such as the BTEC Nationals, particularly the reformed version. You may like to include:

- Their contribution to widening participation.
- Case studies of specific students who stand out.
- Their contribution to the teaching groups in your degree programmes – do they bring something different in terms of skills/experience? You may wish to distinguish between those taking a BTEC only and those taking a BTEC/A Level mix.

- Any specific sectors/sizes of BTEC that are particularly used for entry to your organisation.
- The likely impact that the removal of these qualifications would have on your organisation.

Chapter 2: Level 3 qualifications for 16-to-19-year olds

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

Paragraph 45 refers to the two 'other technical' qualifications in the Technical Pathway. We agree that the two groups are helpful in the landscape but they will not meet the needs of all students. The DfE is looking to remove funding for technical qualifications that overlap with T Levels. Our view is that it is acceptable to have overlap between qualifications if they are serving different purposes. There is of course overlap of content between some A Levels and T Levels. We feel there is justification for retaining a third category of general vocational qualifications to meet the needs of students:

- Wishing to explore a broad vocational sector (i) to determine which specific occupation within that sector they may wish to take up and/or (ii) to provide a good preparation for progression to a wide range of degree programmes related to the sector.
- Wanting to add breadth to their study programme by taking it alongside A Levels.

Question 7: 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)?

These funding criteria are appropriate for the narrow group of additional technical qualifications that they are proposing. However, there needs to be additional criteria for the retention of the category of general vocational qualifications, otherwise the needs of all students will not be met.

Question 8: 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 why.

We agree that, where there is sufficient evidence from employers and students that these would provide valuable pathways for 16-19-year-olds, additional T Levels for pathways or occupations featured on the occupational maps should be developed.

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

Their definition of overlap is very broad and, as their aim is to have a landscape that is mainly A Levels and T Levels, it is likely that they are intending to withdraw many existing vocational qualifications, including many of the BTEC Nationals. We think that it is inappropriate to adopt a simplistic view of what constitutes overlap and a range of factors need to be taken into account. We have explained these in the response to part b) of this question.

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

As we mentioned above, overlap of content is sufficient on its own. Other factors that should be considered as well are:

- **Purpose.** The purpose of a T Level is narrow, preparing students for a specific occupational pathway. The purpose of general vocational qualifications, such as the BTEC Nationals, is to allow students to explore a broad sector to find out which specific part of the sector is of interest to them, and to prepare them for a wider range of progression pathways, including higher education.
- **Size.** Having different sizes of qualification allows students either to a large qualification on its own or to add breadth to a study programme by mixing the smaller vocational qualifications with A Levels. T Levels are too large to mix in this way.
- **Assessment.** Having a range of methods of assessment (e.g. written exams, practical exams, projects, assignments, and presentations) drives the development of a range of knowledge and skills. Therefore, qualifications with similar content but different schemes of assessment with serve different purposes.

It would be helpful here for you to give your thoughts on the impact on your own institution of a reduction in choice of qualification types, e.g. on recruitment, widening participation, etc.

Question 10: 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?

Note that the proposal suggests that these new qualifications to be taken alongside A Levels will be available in a “limited” range of subjects, with such qualifications no bigger than 360 GLH (one A Level equivalent). This would mean it would no longer be possible to undertake popular combinations for HE progression, for example a BTEC National Diploma (2 A Level equivalent), alongside an A Level (e.g. BTEC National Diploma in Health and Social Care with an A Level in Biology, or the BTEC National Diploma in Engineering with an A Level in Maths).

We agree that the examples given in the consultation should be funded to be taken alongside A Levels. However, they should be available in a broader range of subjects and sizes in order to meet the needs of all students.

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. We know that these are generally valued by HE institutions.

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

As indicated in the response to question 10, general vocational qualifications in a wide range of subject areas and sizes should be allowed, otherwise it will result in a narrowing of the curriculum and a limiting of choice.

There is a second issue here as the DfE says that it is not proposing to fund “*Qualifications which do not provide any added value for HE progression over and above an overlapping A level (i.e. those that do not deliver any additional beneficial preparation for HE study). For example, qualifications in business or science are unlikely to be funded since the A level equivalents will provide the best preparation for relevant HE courses.*” If we take the example of Business, A Level Business will usually be delivered in an academic way and is assessed entirely by 3 written exams. The BTEC National Extended Certificate in Business will be delivered through applied contexts and the assessments for the mandatory units require students:

- To take a written exam in personal and business finance
- To carry out research on the business environment and writing a report
- To deliver a presentation on the role of innovation and enterprise in business success
- To complete a supervised task on developing a marketing campaign

Depending on the optional unit taken, they may also be required to:

- Carry out a role play on customer service and evaluate their performance
- Carry out market research and analyse their findings
- Carry out work experience and reflect on their performance

The approaches of the A Level and the BTEC are both valid but the two qualifications will engage different types of student. Some students will achieve better on the A Level and some better on the BTEC. If one of the qualifications is removed, achievement rates are likely to fall and this will result in lower rates of progression to HE.

Looking at the schemes of assessment used on Business Management degree programmes, they seem to be more aligned to the range of assessment methods used in the BTEC. You may wish to comment on your own courses for comparison here.

Question 13: 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?

This question is referring to the limited number of qualifications it is proposing for specific areas such as sport and performing arts that have a strong practical focus and offer breadth and depth that is valued at HE for study in an allied subject. We feel that there is justification for having large general vocational qualifications, like the BTEC National Extended Diplomas (3 A Level equivalent), in a broad range of subject areas. These will provide the third option, alongside A Levels and T Levels, for students who prefer learning in an applied context and who wish to explore a broad vocational area before deciding which specific area attracts them the most. The subject areas should include those with A Levels as, although some content may be similar, the teaching and learning approaches will be different as will the assessments used and the range of skills developed.

Question 14: Do you agree with our proposal the IB Diploma should continue to be funded?

Yes, this is not contentious. However, we would point out here that the IBO offers a qualification called the International Baccalaureate Career-related Programme (IBCP) which combines elements of the IB Diploma with a general vocational qualification, usually a BTEC National (this has to be at least the size of one A Level but the two and three A Level sized BTEC Nationals are the most common ones taken). This has proved successful in schools and the numbers taking it have been growing rapidly. These consultation proposals would not allow continuation of this successful programme.

Question 15: 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?

It would be helpful here if you could provide your own experience of recruitment of BTEC students, particularly those who have taken the reformed qualifications, and indicate the impact that you think these proposals would have on your institution.