



Summary of Pearson's response to the DfE's Post-16 level 3 and below consultation

January 2026

V Levels

Question 1: 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?

Yes

Summary of key risks and recommendations

There are two key risks in fixing V Levels at 360 GLH and relying on T Levels wherever larger qualifications are required.

1. Sector pedagogy and progression mismatch – in some sectors, neither a 360 GLH V Level (nor combinations of them) nor the T Level model can adequately support progression.
2. Capacity, access and suitability constraints – T Level availability and placement capacity are limited, and the model is not appropriate or accessible for all students.

To mitigate these risks, we recommend that:

- 360 GLH V Levels are developed where flexibility and combination are appropriate
- a limited number of large V Levels are permitted where sector pedagogy and progression requirements demand them
- each V Level clearly states its primary intended destination (progression to higher education or progression into employment)
- existing large qualifications are not defunded prematurely, before replacement provision is fully available.

1. Sector pedagogy and progression mismatch

In some sectors, effective delivery of curriculum content, programme coherence, and progression requirements cannot be achieved through either:

- a single 360 GLH V Level or a combination of V Levels; or
- a T Level model built around occupational specialisms and substantial industry placement.

In these sectors, a mixed economy of provision is required:

- 360 GLH V Levels where combination and flexibility are appropriate; and
- a limited number of large V Levels where sector pedagogy, depth of learning, and progression requirements demand a holistic and more coherent programme.

This position aligns with the Curriculum and Assessment Review's conclusions that, in some vocational and creative areas, large qualifications are needed because they carry weight with employers, FE and HE providers, enable students to demonstrate breadth and depth of knowledge and skills in a way that can be benchmarked consistently, and support coherent sequencing of content and assessment, avoiding repetition that can arise from combining multiple smaller qualifications.

It also aligns with the Review's emphasis that reform should build on what already works, rather than removing effective provision prematurely. This is reinforced by Pearson's published longitudinal research (2025), which indicates that large vocational qualification deliver strong salary outcomes, reduce disadvantage for lower-attaining and economically disadvantaged students, and support progression to higher education and skilled employment.

A key reason for this mismatch is that qualification purpose drives design. Purpose determines content depth and breadth, assessment approach, assessment controls, and guided learning hours.

In the current regulatory framework, each qualification-type has a clear priority order of general purposes (including intended progression destination) to inform design decisions where trade-offs are required. For example, A levels are clearly designed to prioritise progression to undergraduate study, and T Levels prioritise progression into specific occupational roles, underpinned by occupational standards and substantial industry placement.

In the consultation, V Levels are described as having a dual purpose, i.e. to support progression to further study; and to prepare students for employment.

However, the consultation also recognises that attempting to serve multiple priority purposes can create confusion and undermine clarity in the system. The risk is that fixing all V Levels at 360 GLH without clarity on their primary destination may result in qualifications that are insufficiently designed for either progression route. We therefore strongly recommend that:

- V Levels may support a dual purpose at qualification-type level, but
- each individual V Level must clearly state which progression destination takes priority (progression to higher education or progression into employment).

This clarity is essential to ensure that qualification size, content depth and assessment approach are aligned with intended outcomes. It does not prevent a qualification from

supporting other forms of progression, but it ensures the design is fit for purpose from the outset.

2. Capacity, access and suitability constraints

Even where T Levels are appropriate, capacity is constrained. The National Audit Office (2025) found that expansion of T Levels is dependent on industry placement availability, with capacity estimated at around 48,000 places. Sector evidence from the Sixth Form Colleges Association indicates that defunding large qualifications without sufficient replacement capacity risks tens of thousands of students falling through gaps, particularly in Digital, Health and Science.

Not all students who require a large qualification:

- are able to access a suitable industry placement
- are well suited to the T Level model, or
- live in regions where placements are available, particularly in sectors dominated by SMEs.

Assuming universal access to T Levels therefore risks disadvantaging students in cold-spot regions and in sectors with limited placement capacity.

3. Risks of premature defunding of large qualifications

If the outcome of this consultation is:

- multiple 360 GLH V Levels in some sectors
- a limited number of large V Levels in others
- recognition of the capacity, access and suitability constraints of some T Levels

then existing large qualifications must not be defunded until replacement provision is fully developed and available.

The planned removal of large qualifications in Digital, Health and Social Care, and Science in 2026/27—ahead of implementing the outcomes of this consultation risks:

- significant system disruption
- reduced participation, and
- loss of established progression routes into higher education and skilled employment.

Question 2: 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?

Possibly

The consultation defines medium sized qualifications as between 421 GLH and 719 GLH. Given we recommend in Question 1 above that a mixed economy is required, i.e.:

- 360 GLH V Levels where combination and flexibility are appropriate
- a limited number of large V Levels where sector needs, pedagogy and progression demand them

it may be the case that medium sized V Levels are more suitable than large V Levels depending on the needs of the sector and the purpose of the qualification.

Question 3: Which subject areas do you think are most appropriate for delivery through V Levels? Please provide evidence of relevance to employment sectors or further study

Summary

Pearson supports a mixed-size V Level system, built around clear, declared progression purposes for each qualification. Subject choice for V Levels must be driven by the intended progression destination. V Levels are most effective where applied, sector-focused study supports progression either to further study (higher education or higher technical education) or to employment, and where qualifications can be combined into coherent programmes.

We therefore recommend that each individual V Level clearly states which progression destination takes priority – further study or employment – even though V Levels as a system can serve both purposes.

Large V Levels need to be available where pedagogy, progression or feasibility require them

1. Small (360 GLH) V Levels from the DfE's indicative list

We agree that many of the DfE's proposed subjects are well suited to 360 GLH V Levels, because they sit in broad sector domains and support mixed study programmes and progression.

We recommend these are developed with a priority progression route to higher education / higher technical education:

- Animation, Games Design and Visual Effects

- Arts, Craft and Design
- Business, Administration and Management
- Criminology
- Digital
- Education and Early Years
- Engineering and Manufacturing
- Finance and Accounting
- Health and Care Services
- Legal Services
- Media, Broadcast and Production
- Music and Music Performance
- Performing Arts
- Protective Services
- Science
- Sport and Exercise Science
- Travel and Tourism

These areas have established recognition by higher education and higher technical providers and are widely used in mixed level 3 programmes that support progression.

We recommend these are developed with a priority progression route into employment:

- Agriculture, Land Management and Production
- Animal Care and Management
- Construction and the Built Environment
- Hair, Beauty and Aesthetics
- Hospitality and Catering
- Sales, Retail and Customer Service

These sectors have strong direct routes into work and apprenticeships, and, in several cases, T Levels have been removed, leaving a gap in level 3 study-programme routes into employment. They also rely heavily on progression from level 2 into level 3, making flexible V Levels particularly important.

2. Additional 360 GLH V Levels Pearson recommends

In very broad sectors, a single V Level title does not provide sufficient signalling or progression power. Students often need more than one applied subject in order to meet higher education or higher technical entry requirements.

We therefore recommend developing additional 360 GLH V Levels, with a priority progression route to higher education / higher technical education, in:

- Sport (distinct from Sport and Exercise Science)
- Mental Wellbeing / Applied Psychology
- Applied Human Biology / Medical Science
- Forensic Science
- Sustainability
- Computing (including AI)
- Information Technology (including cyber security)
- Enterprise
- Esports
- Marketing

These areas reflect labour-market demand, growth sectors and established progression routes, and allow students to build coherent multi-V-Level programmes that are recognised by HE and higher technical providers.

3. Why some large V Levels are needed

Alongside 360 GLH V Levels, Pearson argues that large (1,080 GLH) V Levels are essential in a limited number of sectors, for two distinct reasons.

a) Pedagogy and progression requirements

In some subjects, breadth, depth and sequencing of learning matter. Large V Levels allow:

- A holistic programme design

- Appropriately sequenced content
- Avoidance of duplication across multiple small qualifications
- A volume of subject-specific learning that meets higher education entry expectations

This is particularly important in science, creative and performance-based subjects, where universities often expect substantial subject-specific study rather than three separate small awards.

b) Where T Levels are not viable

In a small number of sectors, T Levels cannot be delivered because:

- The occupations are niche with very low learner volumes, or
- Industry placements are impractical or legally restricted (for example due to age requirements)

In these cases, large V Levels provide the only credible vocational route that can support progression to higher-level employment or further study.

IAG

Question 4. 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?

Clear, high-quality IAG will be critical to the success of V Levels. Given our recommendation that each V Level should have a clearly defined primary progression purpose—either progression to higher education or progression into employment—it is essential that IAG makes this distinction explicit at qualification level. This clarity will help the system: improve student choice, support better study programme design, align more effectively with HE and employer expectations, and build confidence in V Levels as a credible and navigable pathway.

Key recommendations include:

1. Clear explanation of V Levels and their purpose – a nationally coordinated information package for students, parents/carers, providers, careers advisers, HE institutions, employers and professional bodies, including how V Levels differ from A

levels and T Levels, how they can be combined, and the priority progression purpose of each V Level.

2. Transparent progression pathways by qualification – publication of a national HE recognition list for V Levels at subject level, available before enrolment; and over time, progression data and learner journey case studies. We also recommend an interactive progression tool enabling exploration of HE options, apprenticeships and employment pathways.
3. Guidance on subject choice and qualification combinations – clarity that tariff equivalence does not guarantee equal recognition; selective universities may limit numbers or apply subject expectations; and multiple V Levels may limit progression depending on mix and purpose.
4. Science and the Creative Industries – targeted guidance on common entry requirements (e.g., minimum volume of science content, maths expectations, and the risks of overlap/discounting), and how large V Levels may mitigate risks in particular progression routes.
5. No rules of combination – provider-led decision-making – we support DfE's position not to introduce formal rules of combination, as providers are best placed to advise based on student aspirations, local routes and capacity.
6. Managing overlap through design and discounting – strong content design and improved use of discount codes can address overlap concerns without restricting student choice through prescriptive rules. Quisque a eros imperdiet

New T Levels

Question 5: What factors should we consider when creating T Levels where there are currently no level 3 occupational standards? Please explain your answer.

Where there are currently no level 3 occupational standards, decisions to create a T Level should be based on clear, evidence-led criteria. In the absence of standards, it is particularly important to ensure that T Levels are only developed where they will lead to sustainable skilled employment and can be delivered effectively.

Key factors include:

Evidence of genuine and sustainable level 3 occupational demand – use labour market intelligence (including Skills England), complemented by direct employer input. If viable level 3 entry roles do not exist, a T Level should not be developed. Recent experience (e.g., discontinued developments in some areas) underlines this risk.

Existence of recognised professional standards – where occupational standards are absent, established professional standards may provide a credible basis for content and progression in some sectors.

Practical deliverability: industry placements – T Levels should only be created where placements are realistic and accessible for 16–19-year-olds; in sectors where placements are not feasible (including due to age restrictions or SME dominance), a T Level model may be inappropriate regardless of demand.

Level 2 Pathways

Question 6. We recognise that students do change their minds, and some students may wish to transfer between the Further Study pathway and the Occupational pathway. Others may have the opportunity to progress to level 3 or take up an apprenticeship opportunity mid-way through their Occupational Certificate. How can the two pathways, and the two qualifications, be designed to make these transitions as easy as possible?

We recognise that students' aspirations and circumstances change. However, there is a distinction between designing pathways to support transition and designing the qualifications themselves to do so. Because the two qualifications lead to different outcomes, they will necessarily contain different content, and it is challenging to engineer seamless transition through qualification design alone.

We recommend that DfE focuses on clear national guidance on transition arrangements, including:

- when and how students can transfer between pathways
- how partial achievement should be recognised
- how funding arrangements should operate to avoid penalising students or providers.

We also recommend clear national progression maps showing how each qualification links to: level 3 academic routes, level 3 technical routes, apprenticeships and employment. Finally, we note provider capacity constraints: some colleges may not be able to run two level 2 programmes within the same sector, limiting real learner choice; this must be understood and mitigated.

Foundational Certificates

Question 7: We're proposing that all Foundation Certificates are the same size – 240 guided learning hours – to ensure they are a consistent size and can fit

within a one-year study programme allowing for English, maths and non-qualification activity such as employability, enrichment and pastoral support, and exposure to level 3 study. In taking this approach, are there any risks or issues we need to be aware of?

Possibly.

We recognise that 240 GLH can fit within a one-year study programme alongside English, maths and wider activity. However, evidence from current provision shows many 16-19 students at level 2 are enrolled on larger qualifications, reflecting differences in English/mathematics requirements and the reality that 360 GLH qualifications can be broadly comparable in size to a full GCSE study programme.

Our analysis of current level 2 registrations shows a substantial proportion of 16-19 registrations are on 360 GLH+ qualifications. We also note progression data indicating slightly higher progression into further learning for students taking 360 GLH qualifications compared with those taking 240 GLH qualifications.

Providers are best placed to judge how GLH should be allocated within one-year programmes, given local needs, student starting points, and the balance between qualification and non-qualification activity.

Question 8: Should any additional criteria be considered when selecting the subjects suitable to become a Foundation Certificate? If yes, what are they and why?

Yes.

We agree with the criterion for determining whether a subject is suitable to become a Foundation Certificate but stress the need for clear, credible progression routes to level 3 study. Progression requirements should determine both whether a Foundation Certificate is appropriate and what content it should include.

Recommended additional criteria include:

Clear sector-specific progression pathways – progression must be understood sector-by-sector to avoid students completing qualifications without meaningful next steps. Some sectors have broad progression options; others have narrower, more occupationally specific progression where an alternative level 2 route may be more appropriate.

Ongoing review aligned to future skills and growth sectors – as new level 3 routes are introduced for growth industries and emerging technologies, corresponding Foundation Certificates may be required to support level 2 progression.

Question 9: Are there any other potential subjects you think should be considered for Foundation Certificates? If yes, what are they and why?

Yes.

We propose that Sustainability and green technology should be considered for Foundation Certificates, reflecting cross-sector demand driven by the transition to a low-carbon economy and progression routes into engineering, construction, environmental sciences and emerging green skills pathways.

We also note that clarification is needed on existing subject groupings (e.g., the scope of “Creative, Media and Design”, and whether Performing Arts enables meaningful specialisation), to ensure subject titles map to credible progression and curriculum design.

Occupational Certificates

10. We expect the occupational pathway to last two years, in line with current legislation. However, we recognise that some learners may have legitimate reasons for leaving the pathway early, such as progressing to a work-based training programme or moving on to a level 3 qualification. Are there any other circumstances you believe would justify a learner stepping off the pathway before completing the full two years? Please provide examples and explain why these should be considered.

Possibly.

Providers are best placed to judge when it is appropriate for a student to step off early, given knowledge of individual circumstances, local labour markets and progression. Beyond mid-way progression opportunities, factors such as motivation and engagement (particularly for some level 2 students) and personal or socio-economic disruption may justify early exit within a clear national framework. This aligns with wider commitments to reduce NEET risk and improve support for students with additional needs.

Question 11: We are proposing that DfE sets introductory core content for Occupational Certificates which is shared across multiple related qualifications. Do you agree with this approach?

Yes.

Question 12: Please give reasons for your answer.

We agree provided core content is tightly defined, genuinely transferable, and meaningful for students. We also highlight:

- Occupational Certificates should only be developed where there is clear level 2 occupational demand (supported by labour market intelligence and employer input).
- We have concerns about the qualification title “Occupational Certificate” at Level 2 and recommend “Technical Certificate” as a more accurate description of a largely classroom-delivered model, reducing confusion with competence-based/workplace qualifications.

Question 13. We believe the sizes of each Occupational Certificate should be variable and driven by the Skills England national occupational standard(s) it is linked to, as opposed to having a fixed size for all Occupational Certificates. Do you foresee any challenges with this approach?

Yes.

Question 14: If so, what are they and how might they be overcome?

We agree sizes should be driven by occupational standards, but recommend a minimum GLH for comparability, funding consistency and timetabling. We also note some existing level 2 qualifications confer licence to practise; content must support these requirements where needed to ensure students are prepared to step into the workplace.

Question 15: We are proposing the size of the broad introductory core content should be proportionate and should be less than 50% of the overall GLH. Do you foresee any challenges with this approach?

Yes

Question 16: If so, what are they and how might they be overcome?

We agree this should be a maximum, and in many qualifications the proportion should be far less. Appropriate balance will vary by occupational group; overly large “core” components risk reducing relevance and progression.

Non-qualification activity

Question 17: What non-qualification activities do you think are successful at supporting vocational students to engage best in their course content in order to achieve in their course and progress to their stated destination?

We agree non-qualification activity plays a critical role in supporting engagement, achievement and progression, particularly for SEND and disadvantaged learners. Providers

are best placed to determine what is most effective locally. Evidence from research on enrichment in the 16–19 phase indicates benefits for engagement, retention and wider outcomes, but also highlights inconsistency in access and the need for a coherent national approach, properly funded and treated as integral rather than peripheral.

Transition and branding

Question 18: We plan to roll out V Levels, Foundation Certificates, and Occupational Certificates together by route, to ensure coherence across levels and clear progression. Do you think this is the best approach?

Yes.

Are there alternative rollout strategies we should consider, or any unintended consequences we might be overlooking?

We agree route-by-route rollout is strategically sound, but highlight significant implementation risks that require mitigation: system complexity during transition; an extremely challenging timeline (including provider readiness and HE recognition); capacity and equity considerations (including providers that do not deliver A Levels); and protecting the credibility of the new V Level brand through a phased, quality-led introduction rather than scale-first rollout.

Question 19: 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?

High-quality outline content depends on structured and representative consultation (including HE), maintaining high-level specification that avoids pre-determining assessment modality, integrating knowledge and skills, clarifying relationships with occupational standards (especially where progression to further study is the priority), embedding future-facing skills while remaining accessible, setting expectations for cognitive demand and synoptic learning, and ensuring level 2 qualifications remain applied and engaging.

We also share high-level recommendations for V Level assessment and grading: purpose-led, integrated assessment combining applied synoptic elements and structured exams where appropriate; robust controls and quality assurance; and grading approaches that reinforce purpose, support comparability and recognition, and provide transparent outcomes for students, employers and higher education.

Question 20. We're proposing that there is no awarding organisation branding for V Levels, Foundation Certificate and Occupational Certificate titles to make qualifications easier to understand.

Do you foresee any problems with this?

Yes.

How could we mitigate these?

We foresee significant regulatory, operational, and equality-related risks if awarding organisation branding is removed. Ofqual requirements require awarding organisation names in qualification titles; operationally, branding supports identification, administration, quality assurance accountability, verification, and recognition by HE and employers—particularly during transition. We recommend combining national pathway identity with awarding organisation name (consistent with A Levels) to mitigate risk and protect recognition and progression.

We also highlight that V Levels should not be developed/managed using the procurement and contract-based model used for T Levels; a competitive, regulated awarding market aligned more closely to A Levels is likely to support subject expertise, responsiveness and continuous improvement.

Equalities Impact

Question 21: Could any of the proposals have an impact – positive or negative – on people with any of the following protected characteristics? Please explain your answer.

Age

Disability

Race

A full impact assessment has not yet been published, so precise quantification is not currently possible. However, available evidence indicates likely disproportionate negative impacts for some groups. In summary:

- Age – adult learners are disproportionately reliant on large vocational routes into higher education, reducing availability risks restricting access for older learners.
- Disability – rapid implementation and more fragmented programmes risk increasing complexity and reducing continuity of support for SEND learners unless mitigations, timelines and resourcing are strengthened.
- Race – evidence indicates some ethnic groups are more likely to rely on vocational qualifications for HE entry; reducing large qualification availability risks exacerbating inequalities and may have secondary workforce diversity impacts in key sectors.

Question 22: What action could help reduce any negative impacts you identified in the previous question?

Protected characteristics affected: .

Age
Disability
Race

Recommended actions include:

1. A longer, more flexible phased implementation timeline
2. Targeted, ring-fenced resourcing for SEND learners through transition
3. Publication of a full equality impact assessment prior to final implementation.

Question 23: Are there elements of V Levels or Foundation and Occupational Certificates that are required in your view to increase accessibility or improve outcomes for those with SEND?

Yes.

Key requirements include inclusive assessment design with flexibility and multiple ways of demonstrating achievement; avoiding over-reliance on a single qualification model or size; and retention of flexibility to build bespoke and stepped pathways. Without these, there is a risk the reforms narrow access and reduce progression for some learners.

Question 24: Are there any other equality-related impacts you think we should consider?

Yes.

We highlight socio-economic disadvantage as a significant equality concern (though not a protected characteristic) that intersects with protected groups. Evidence indicates large vocational qualifications play a key role in widening participation and improving outcomes for lower-income learners, including progression to HE and early earnings outcomes for those entering work directly. Restricting access risks worsening inequality, reducing social mobility and increasing NEET risk.