

Spotlight on **Workforce** **Skills**

A policy report into the
changing face of post-16
education policy in England

Policy series: No. 1-4



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Executive Summary

Post-16 education is at the heart of the current government's plans for economic recovery and its wider "levelling up" agenda. Significant change is on the way, highlighted by the Skills for Jobs White Paper and the Skills and Post-16 Education Bill.

Within this context we wanted to understand the impact of the coming reforms. What could they mean for learners, providers, higher education institutions, and employers across England? We also sought to understand the impact of these changes in the context of the unprecedented challenges the country faces in maintaining jobs, boosting productivity, and economic growth.

The four papers focus on the following key areas of post-16 policy:¹

1. 16-19 qualifications
2. Higher Technical Education
3. Lifetime Skills Guarantee
4. Lifelong Loan Entitlement

The papers draw upon desk research, policy roundtables (with employers, education establishments, representative bodies, and politicians), and public polling over the last six months.

History tells us devising and implementing a successful post-16 education system is complex and difficult. The government's focus and proposed direction of travel is welcome. The government has consulted widely and we hope they continue to listen to the valuable insights practitioners, employers, and learners provide.

The scale of reform means that all elements of the system need to be looked at in the round. This is why our research has focussed on post-16 education as a whole.

It is also important for government to consider what has and has not worked in the past. However, the turnover of officials, advisers, and ministers means Whitehall struggles to retain vital institutional memory. **This is a point made by the Institute for Government.**

Executive Summary (continued)

Our research has highlighted ten barriers to success which should be addressed if the current post-16 education reforms are to succeed:

1. The current system is overly rigid and inflexible regarding the regulation and funding rules for post-16 learning. This will only be exacerbated by the current reforms at level 3 which risk narrowing opportunities for young people.
2. Greater flexibility needs to be introduced within the system to incentivise participation and give individuals greater control and autonomy over their learning.
3. The fragmented system of funding for post-18 education skews participation and demand for certain learning pathways.
4. The HTE/HTQ reforms are designed to create a shift in participation for post-18 learners, encouraging students to consider L4/5 as well as degree options. To succeed, the design of new HTQs needs to be aligned to HE frameworks and to the focus on smaller credit and modular learning within the Lifelong Loan Entitlement (LLE).
5. The funding system for post-16 education needs to be more responsive to fit around individual learner need. The LLE is a positive step towards this but several regulatory barriers need to be addressed for the policy to succeed.
6. Navigating the complexity of the post-16 system remains a challenge for many, particularly encouraging adults back in to learning to upskill and/or reskill.
7. The overlapping number of accountable and regulatory bodies within the post-16 landscape risk creating greater fragmentation rather than coherence within the system.
8. The post-16 system risks misalignment with the demands of the labour market and needs to be more agile to respond to shifting skills and employment patterns. The level 3 reforms could exacerbate this by removing high quality qualifications that are recognised and valued by employers.
9. The balance between national oversight and local autonomy needs to be better aligned, where the broad policy framework is set at the national level but local flexibilities enable providers and employers to deliver local strategies based on local circumstances. Local Skills Improvement Plans could support this but their emphasis needs to be on local need rather than accountability.
10. There needs to be greater building of institutional memory within government in terms of looking back to gain an appreciation of previous policy reforms within post-16 education. This will build a better understanding of what has been successful and enduring, and what has previously been attempted but ultimately not stood the test of time. Grounding the current reforms within this context will ensure greater coherence and likelihood of enduring policy reform.

Policy paper 1:

16-19 qualifications



“Education reform of the last thirty years is littered with qualifications reforms, of which perhaps two have been genuinely successful, and many others an expensive failure. And the two that succeeded - the introduction of GCSE, and the development of BTEC awards - were successful because they responded to a broad and irreversible change in aspirations, for progress to further and higher education, and therefore for delayed specialisation and selection.”

Baroness Wolf

Review of vocational education: the Wolf report 2011 ⁱⁱ

BACKGROUND

Intention and direction of travel

The government’s formal review of post-16 qualifications at level 3 began in 2019 with the aim of ‘simplifying’ the qualifications landscape. The review proposes that 16-19 year-olds will, in the main, have a choice between an academic and a technical route, and the removal of funding for ‘overlapping’ qualifications.

The review assumes that T Levels and A levels will overlap with many existing high-quality and broad level 3 vocational qualifications. There is concern that current high performing qualifications that support learners to progress into higher education and into careers, such as BTEC, will no longer be available. The removal of existing qualifications will start in 2023 for technical qualifications and in 2024 for academic qualifications.

Story so far

- **April and July 2016:** Major review of technical education led by Lord Sainsbury (**Sainsbury Review**), and **Department for Education DfE Post-16 Skills Plan** – proposed a 16-19 system made up of ‘academic’ and ‘technical’ qualifications.
- **May 2018:** **DfE’s response to consultation on T Levels** – recognition of the need to fund some other qualifications in addition to A levels and T Levels.
- **March 2019-June 2019:** **Stage 1 of DfE Review of Post-16 qualifications at level 3 and below** confirmed proposal for A levels and T Levels to become the qualifications of choice for 16 to 19 year olds at level 3, and qualifications that ‘overlap’ with A levels and T Levels should not be approved for public funding.
- **October 2020-January 2021:** **Stage 2 of DfE Review** (now level 3 only) reiterates proposals to move to a binary choice between academic and technical route, and to remove funding for overlapping qualifications.
- **July 2021:** Publication of **government’s response to Stage 2 consultation**.

KEY ISSUES

Our research has highlighted a number of risks relating to the proposed reforms:

Disruption to high-quality qualifications that work ⁱⁱⁱ

- Significant changes have been made to qualifications in recent years. These newly reformed qualifications, meeting government performance table requirements, have been welcomed. They are recognised as being robust by providers, employers, and learners. Care should be taken to ensure that decisions are based on up-to-date information and public consultation.
- Many qualifications at risk of defunding, including BTEC qualifications, have been identified by the DfE as ‘High Value Courses’ as they lead to higher wage returns, support the Industrial Strategy, and enable increased productivity. ^{iv}

Narrowing learner access and opportunity

- Based on DfE estimates 15% of all 16 to 19 enrolments at level 3, and 43% of non-A level enrolments at level 3 are for qualifications at risk of defunding as part of the review. ^v
- Many providers will require a grade 4 in English and maths to access a T Level, which could deter some students from enrolling. If other qualifications have been defunded, these students will be left with less choice and a narrowing of opportunity. Where English and maths are an exit requirement, this could also impact learner completions. ^{vi}

Wage returns and employment prospects

- It is important to protect qualifications that are proven to enhance earning and employment prospects. Research shows that BTEC learners tend to be earning more than A level learners by age 22, even accounting for the fact that A level learners are more likely to enter the labour market later. ^{vii}

Diversity and inclusion

- Learners with SEN, from Asian and Black ethnic groups, males, and those from disadvantaged backgrounds are all more likely to be negatively affected by the proposed changes. ^{vii}
- 44,000 learners from Asian and Black ethnic groups could be affected. The proportion of learners currently enrolled on qualifications at risk of losing funding is twice as high in the most disadvantaged quintile (20%) than as in the least disadvantaged quintile (10%). 40,000 (25%) SEN learners could see their provision removed. ^v

Higher level skills, diversity and inclusion in higher education, and supporting higher level skills needs

- The proposals could have a negative impact on thousands of individuals progressing to HE. Qualifications, such as BTEC Nationals, are accepted by all UK universities. Around one in four enter HE with a BTEC - over 100,000 students a year.
- The proposals could reverse recent trends to widen diversity and broaden inclusion. HESA data shows that a greater proportion of BTEC learners entering HE come from an ethnic minority background when compared with A level learners (17% Asian and 14% Black and 12% Asian and 5% Black respectively) and come from the bottom four socio-economic groups (32% and 17% respectively).^{ix}
- Research by the National Education Opportunities Network (NEON)^{vii} shows that widening access to HE will reverse from 2024. If half of the learners taking BTECs or a combination of A levels and BTECs were no longer able to progress to HE this would, relative to 2020, set participation by the most disadvantaged groups back to 2015/2016 levels.

Employment and the UK economy

- Limiting the development of all qualifications to employer-led standards will not allow for the flexibility and agility needed to meet newly emerging demand, and jobs of the future. In the 2011 review of vocational education, Baroness Wolf argued that the micro-management of qualification specifications impeded awarding organisations' ability to respond to market need.^x
- Many qualifications under threat of defunding contribute to the UK education export strategy and to net education export targets. Applied General qualifications overall contribute £180m annually to GDP, according to the 2021 Ofqual annual report. BTEC is taught and recognised in more than 80 countries around the globe.^{xi}

RECOMMENDATIONS

A number of clear themes emerged from the research and have formed the basis of our recommendations:

1. Retain qualifications that support key sectors in the economy ^{xii}

- Level 3 BTEC courses and other Applied General qualifications offer a good foundation for learners to study higher technical and vocational courses to secure qualifications at level 4 and above - essential for entering the labour market. ^{xiii}
- In the context of supporting the health sector, participants at the North West policy roundtable raised the risk of removing the funding of the BTEC in Applied Sciences. These qualifications are taken by over 25,000 learners each year and support progression routes into a broad range of careers.
- In 2017, learners with a BTEC in Applied Science accounted for over 15,000 higher education learner enrolments, taking a range of degree courses such as nursing, biology, and other subjects allied to medicine.
- Roundtable participants reported that more young people want to undertake courses of proven value in key sectors such as health.

2. Protect learner choice and opportunity

- Level 3 BTECs are taken by around 250,000 students each year, with over 100,000 progressing to university.
- Choice needs to be maintained to support learner progression, including qualifications that delay specialisation. ^{xiv}
- With the removal of high-quality qualifications and no proven alternatives in place, many students will be left without opportunities for progression and no suitable options at level 3. ^{xv}

3. Address the negative impact of reform on disadvantaged students ^{xvi}

- Those from SEND backgrounds, Asian and Black ethnic groups, disadvantaged backgrounds, and males are all more likely to be negatively affected by the removal of level 3 qualifications.
- Proposals could reverse recent trends to widen diversity and broaden inclusion in HE and the careers these pathways lead to. Evidence shows HE participation by the most disadvantaged could be set back to 2015/2016 levels. ^{viii}

RECOMMENDATIONS (continued)

4. Slow down the speed of reform ^{xvii}

- The timelines for the reform are extremely ambitious. Under current plans a huge number of high-quality qualifications that support learner progression to employment and to higher education will be withdrawn before the relevant T Levels have been given sufficient time to become established.
- T Levels rely on industry placements which require significant employer engagement and recognition. In the latest Ofqual report 'Perceptions of Vocational and Technical Qualifications in England, July 2021', the awareness of T Levels among employers was found to be 12%. The risk of geographic 'cold spots' for some T Levels remains an issue. ^{xix}

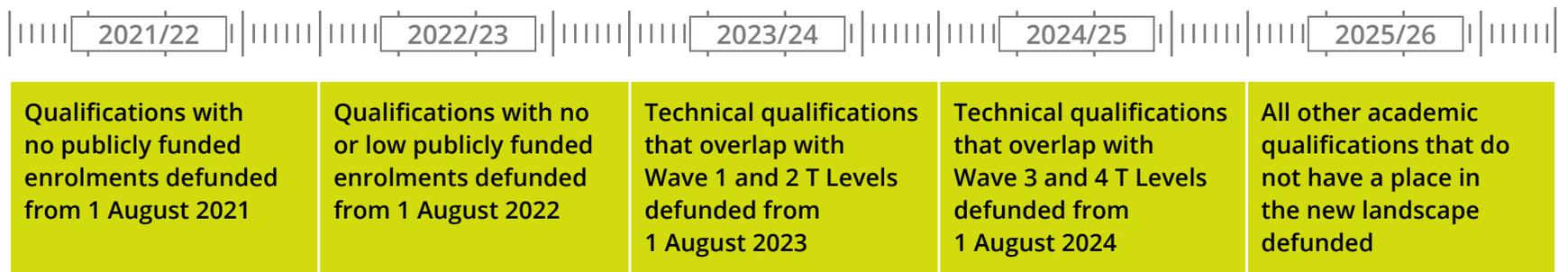
“[Government should] create a new roll out plan that ensures T Levels are a success, whilst not inadvertently disadvantaging thousands of already disadvantaged students with their quest for speed.”

Association of Colleges July 2021 ^{xvii}

“ [Government] must not underestimate the scale of the T-level reforms and the impact of prematurely ending funding for existing qualifications.”

Confederation of British Industry June 2019 ^{xviii}

Timeline for removal of existing level 3 qualifications



What we heard

In April we held two policy roundtables (covering the North West & South West) to discuss 16-19 qualification reform and explore how current provision supports local learners and sectors, and the impact of change on the wider region. Four clear themes emerged:

- 1. A broad mix of qualifications.** Employers recognised that in an increasingly fluid labour market, individuals will require access to a mix of qualifications that support flexible career paths.
- 2. Protecting access & opportunity.** The potential for many young people, especially disadvantaged students, to be 'left behind' as a result of qualification reform was highlighted. Participants were worried the new system would restrict opportunities to progress on to Higher Education or employment.
- 3. Agility required to meet future needs.** Participants emphasised the need for a system flexible enough to adapt to the changing world of work. Limiting choice and removing high quality qualifications that have proved to be adaptable would undermine this.
- 4. Meeting local needs.** Providers and employers want the flexibility to develop solutions to meet local skills and labour market needs. Often national funding rules prevent this from being achieved. Creating local opportunities would improve local talent retention and development.

What the polling told us

We undertook research, carried out by Censuswide, on student, parent, and employer sentiment towards education choice to support future careers.*

93%

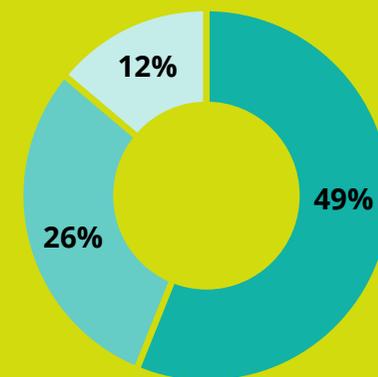
of 14-19 year olds studying believe it is important to have a range of education options in order to prepare them for the future

81%

of 14-19 year olds and **81%** of parents say that courses should provide a range of practical skills, alongside theory-based learning

The top three attributes employers considered when hiring school and college leavers, and university graduates are:

- Enthusiasm for the role and willingness to learn
- Knowledge, practical/technical skills and transferable skills required for their career
- A good understanding of the industry



* Research undertaken by Censuswide 27.11.2020 - 02.12.2020.

Policy paper 2:

Higher Technical Education



“The Augar review highlighted the complexity of the funding system, the bias that propels young people into universities and away from technical education. It is time to end that bias.”

Prime Minister, September 2020. ^{xx}

BACKGROUND

Intention and direction of travel

Higher technical education (HTE) forms an important part of the government’s plans to ensure the economy has the right skills, at the right level, in the right places. The focus on HTE is driven by the need to reverse a historic decline in participation at levels 4 and 5.

The government is looking to create quality alternative pathways to degrees, through the development of a system of HTE where learners can access high-quality courses that provide the knowledge and skills that employers require.

The reforms include the development of a national approvals process for new Higher Technical Qualifications (HTQs) that meet employer developed occupational standards (in the same way as apprenticeship standards). The Institute for Apprenticeships and Technical Education is now responsible for HTE and the first new HTQs for Digital will be delivered from 2022.

Students on courses of higher education at higher education institutions and further education colleges - England, 2000-01, 2009-10, 2014-15

	2000/2001	2009/10	2014/15	
Bachelor	786,800	1,184,000	1,707,800	
Sub degree*	575,700	508,000	313,000	
				217% GROWTH 45% DECLINE

* Sub-degree includes Higher Nationals

Source: QAA *Sub-bachelor Higher Education in The United Kingdom* 2017

Story so far

December 2018 Gatsby Foundation published The Missing Middle: Higher Technical Education in England.

May 2019 Review of Post-18 Education and Funding (otherwise known as The Augar Review) which highlighted the importance of modular learning, lifelong learning loans, the importance of FE colleges and level 4 and 5 education.

July 2019 DfE consultation on Higher Technical Education (HTE) setting out plans for a system of employer-led national standards, ensuring high quality provision, and stimulating demand for HTE.

July 2020 DfE publication of consultation findings confirming new Higher Technical Qualifications (HTQs) conforming to employer-led national standards.

Autumn 2020 Approval process for new Digital HTQs opens for awarding bodies.

January 2021 Interim response to The Augar Review published.

July 2021 List of digital HTQs approved by IFATE published.

September 2022 First teaching of Digital HTQ
Cycle 2 first teaching 2023: Digital, construction, and health routes.
Cycle 3 first teaching 2024
Cycle 4 first teaching 2025

Impact of twenty years of policy change

- Policies introduced over the last two decades have resulted in significant changes in the pattern of post-18 study. These have driven decisions about what, how and where learners study.
- The drop in participation at Level 4 and 5 since 2000 cannot be attributed to one single factor, rather to a series of cumulative policy changes including: the introduction of Foundation Degrees, the Equivalent & Lower Qualification policy (ELQ), and a shift to degree level requirements in some professions (e.g. policing, paramedic, nursing, and teaching).
- As a result, we have seen the decline in take-up of Level 4 and 5 qualifications over the last twenty years where the numbers studying for HNC/HNDs are equivalent to 2% of all undergraduate students (2016/17).
- At the same time we have seen a growth in university enrolments where England now has one of the highest university participation rates among OECD countries.

KEY ISSUES

High-quality higher technical education is essential to a world leading, modern economy ^{xxi}

- The average productivity of UK workers lags global competitors – Germany is around a quarter more productive.
- Only 10% of all adults in England aged 18-65 hold a higher technical qualification as their highest qualification, compared to 34% of adults in Canada.
- However, 92% of level 4 and 5 graduates progress to positive destinations. For those progressing to full employment, the mean starting salary is £27,000.
- Underpinning progress here will be a change in culture as graduate study remains a default position for many. A greater awareness and appreciation of the value of HTE amongst learners is key. Careers advice in schools and colleges would support this.

Embrace proven and valued courses

- The new system should build on the foundations provided by existing high quality and employer-valued courses at levels 4 and 5. Recent history has demonstrated that even the best-intentioned policy changes can have a negative impact on respected qualifications. ^{xxii}

Developing system that can respond to changing needs

- Aligning HTQs to occupational standards risks narrowing learning and progression opportunities. There could be a disconnect between job specific standards and the common knowledge, skills and behaviours required to progress in a sector.
- HTQs need to be agile enough to remain relevant in the face of rapid change – and equip learners for the jobs of today and tomorrow. There is the risk that occupational standards could become the reflection of a point in time. ^{xxiii}
- Questions remain as to how HTQs aligned to national occupational standards will be agile enough to meet local skill needs.
- The current HTQ design and IFATE requirements for occupational standard mapping will need to be balanced with the move to more modular and flexible learning. At present how this can be achieved is unclear.
- HTQs are funded as full qualifications - and yet the new Lifelong Loan Guarantee includes funding for modular learning. Policy needs to be coherent and complementary.

What we heard

In May we held two policy roundtables (covering the North East and Midlands) to discuss HTE which explored the new reforms, how to ensure success, and HTE's role in their region.

The key themes were:

1. Developing a pipeline. Students need to understand the range of post-18 options available. As numbers show, university degrees remain first choice and are often the only option students are aware of.

2. More flexible qualification design. HTQs recognise full qualifications – but flexibility (i.e. modular delivery) is required to encourage participation at levels 4 & 5. Many speakers referenced the prohibitive nature of the current funding system, and believed funding for modules would lead to more agile local provision.

3. National standards meeting future needs & local demand. Although cautiously welcoming the alignment of HTE to employer standards, participants questioned their ability to keep pace with changes in the workplace. There was also a worry that the new standards might not reflect or be flexible enough to meet local requirements.

4. Barriers to participation. At our North East discussion in particular, attendees spoke of the problems encountered by students in terms of local transportation and 'digital poverty'.

RECOMMENDATIONS

A number of themes emerged during our research to improve HTQs. They can be grouped under four areas:

1. Improving the design process

- Ensure that the design of HTQ is undertaken within the context of UK higher education. Build the recognition between 'academic' and 'technical' routes and acknowledge that many degrees are also technical (e.g. HTQ in engineering).
- The design of HTQ should consider reference to HE Benchmarks such as the FHEQ. Without this progression pathway for learners, access to higher level study could be reduced, and the implementation of modular HE/HTQ and LLE funding will be problematic (with no credit framework or levelling in terms of demand).
- Consideration needs to be given to how approving HTQ against occupational standards risks gaps in HTQ provision where there are no occupational standards. This could mean increasing the number of standards which may undermine the government's objective to simplify the qualification landscape at levels 4 and 5.
- The public consultation feedback which IFATE collects regarding the HTQ submissions of individual Awarding Organisations' (AO) should be shared confidentially with the relevant AOs. Feedback should be anonymised. This would support the continuous improvement of submissions and quality standards.

2. Regulation to support HTQ uptake

- Ensure alignment between Professional, Statutory and Regulatory Bodies (PSRB) and DfE & IFATE. Having the backing of professional bodies will help support the acceptance of HTQs with learners and employers.
- Consider the effect of the complex overlaying of the IFATE approval process with the existing regulatory requirements of the OfS/Ofqual. Any additional bureaucratic burden and cost (e.g. increased development, validation, and approval timelines) could lead to a less efficient market for level 4 and 5 qualifications.

3. Supportive funding arrangements

- Provide clarity of funding arrangements. Understanding funding levels for all level 4 and 5 qualifications will enable providers to properly engage with HTQs.
- Ensure that funding supports the delivery of flexible and modular provision. This would encourage and enable agile provision from providers to meet local needs and support greater uptake of HTQs.

4. Building the HTQ brand and reputation

- The government's focus at this early stage of reform should be on building the visibility and profile of HTQs, highlighting the economic and personal value that HTE can bring to the individual and the economy.^{xxiv}

Policy paper 3:

Lifetime Skills Guarantee



“Adults will increasingly need to upskill and reskill throughout their lives. The current approach to education funding is overwhelmingly focused on education before the age of 25. We must move away from this model, towards a system and culture of lifelong learning that encourages education at any age.”

Education Select Committee,

December 2020. ^{xxvi}

BACKGROUND

Intention and direction of travel

The government’s package of reforms is an acknowledgement of the skills gaps that exist across the economy. Ultimately the government’s aim is to improve productivity and international competitiveness. This begins by developing the skills that meet the requirements of young people, adults, and employers at local and national levels. Attracting adults back into learning is key to achieving this.

In September 2020 The Prime Minister set out the government’s vision for a new Lifetime Skills Guarantee (LSG), to address these structural issues and support everyone to train and retrain at any stage in their lives. Further detail on the component parts of the LSG have now been published (see opposite).

The current plans will see a significant shift in local education and skills oversight. For example, the Skills and Post-16 Education Bill provides the Secretary of State with the power to intervene in local course commissioning through new Local Skills Improvement Plans (LSIPs).

Lifetime Skills Guarantee

The government’s Lifetime Skills Guarantee aims to address the country’s skills requirements and broadly covers two areas - Adult Skills (level 3) and the Lifelong Loan Entitlement (level 4-6). The latter is covered in section 4 of this paper. The new Lifetime Skills Guarantee contains two core elements to support learning at level 3 - the level 3 Adult Offer (L3AO) and Skills Bootcamps:

(i) L3AO

From April 2021, any adult aged 24 and over without a full level 3 can access fully funded courses from a DfE-determined register of qualifications. Courses will be available in a variety of lengths (minimum 60 GLH) with some not leading to a ‘full level 3’ qualification.

Funding for the level 3 adult offer will be routed via Mayoral Combined Authorities (MCA) and the Greater London Authority (GLA) through their Devolution agreements, or through the Adult Education Budget (AEB) and administered by the Education and Skills Funding Agency (ESFA). Learners aged between 19-23 year will continue to be eligible for their first full level 3 via the AEB and will be eligible for any additional qualifications made available through this offer.

(ii) Skills bootcamps

Skills bootcamps offer free, flexible courses of just 12 to 16 weeks (level 3+). They give people the opportunity to build up sector-specific skills and

fast-track to an interview with a local employer. Courses are available to develop digital skills including software development, digital marketing and data analytics. Skills bootcamps will now also include courses in technical skills such as welding, engineering, and construction. Bootcamps are currently being piloted in six regions and the £43m will expand the programme further – both the number of regions and course subjects.

(iii) Local Skills Improvement Plans

Eight local areas have been chosen as LSIP trailblazers. They will begin work in 2021 and are: Cumbria, Kent, Lancashire, Leicestershire, South Yorkshire, Sussex, Tees Valley, and West of England.

(iv) National Skills Fund

Worth £2.5bn, the National Skills Fund (NSF) aims to help adults to train and develop skills that support their career. Free adult access to level 3 courses and Skills Bootcamps are covered by the NSF. The government is currently consulting on how to raise awareness of these offers and improve ease of engagement.



What we heard

In June we held a policy roundtable (covering Yorkshire, the South East, East Anglia, and London) to discuss adult education and LSIPs. The key themes were:

- 1. Flexibility and modularity.** There is increased learner demand for modular provision at levels 2 and 3. Having this flexibility would support accessibility – modules could provide a bridge to further study. The majority of level 3 qualifications are full size and should be designed to break down and receive funding to allow for study to fit the individual requirements of young and adult learners.
- 2. Level 3 entitlement needs to cover retraining.** In order to provide the retraining the economy requires, the new offer should include those with existing level 3 qualifications.
- 3. Support where it is needed the most.** Many felt the current package of support does not help where the need is greatest. Many adults have financial commitments and funding rules and restraints are proving a blocker to some. Flexibility around learner maintenance loans would help.
- 4. More than just qualifications.** The personal and social development of learners is an important aspect of adult learning. It includes supporting independent learning, as many adults will have been out of education for a number of years. There was also a clear message that adult learning is not simply about qualifications, it is in many cases about building learner confidence as well.
- 5. Ensuring LSIPs deliver for the regions.** Participants were worried that LSIPs could become dominated by large employers. Although encouraged by the central role of employers, lots of questions remain – in particular how to involve smaller businesses.

KEY ISSUES

Several issues and themes emerged during our research:

Level 2 attainment

- There are six million adults who do not hold a level 2 qualification. Without the correct support they stand little chance of being able to benefit from the new level 3 entitlement. ^{xxv}
- Qualifications that support upskilling can give adults the confidence and motivation to progress to higher levels. Some adults need broader qualifications to support progression to level 3.

Barriers to learning

- A theme throughout our roundtable series was the barriers preventing people from learning. Research by the Learning and Work Institute placed them into three groups: situational barriers (e.g. time pressures and financial constraints); institutional barriers (e.g. lack of flexibility in the provision); and dispositional barriers (e.g. lack of confidence or interest).

Courses available under the level 3 adult offer

- There has been some criticism of the initial choice of courses on the new level 3 register. The Education Select Committee stated in their report into Adult Skills and Lifelong Learning that although 'courses align with national skills priorities, the list does not necessarily reflect local, sub-regional and regional labour market needs and priorities.' ^{xxvi} For example, retail, a sector with skills gaps, is not covered by the current course offer.

FE funding and demographic impact

- The ONS predicts the number of 16-19 year olds to rise by 20% between 2020 and 2030, which will have an impact on the ability of colleges to accommodate this growth in numbers. Recent analysis by the IFS also highlighted this issue. ^{xxvii}



RECOMMENDATIONS

The current direction of policy is positive but more could be done to support the upskilling of adults across England.

1. Building a ladder to level 3 and beyond

- Broaden the focus of the entitlement to level 2 and below. Although welcome, the level 3 entitlement does not go far enough. To ensure that there are sufficient people able to take up the entitlement, there has to be a broader focus including level 2 and below. With six million adults not achieving level 2, the social and economic benefits of a level 2 qualification (and potentially beyond) are clear and well-evidenced, as shown by the work of the Education Select Committee.^{xxvi}

2. Addressing the barriers to education adults face

- Cross government policy has to recognise and address the different barriers that prevent adults from engaging in learning or training.^{xxix} For example, maintenance funding rules needs to be flexible in order to provide the support adults require. Similarly, qualification design and delivery must be able to fit around people's lives.

3. Reskilling and the role of additional level 3 qualifications

- Individuals should be entitled to an additional level 3 qualification where it is shown to meet employer demand for specific skills. This skills need could be assessed and prescribed through LSIPs.
- The government's own analysis highlights the importance of achieving a level 3 qualification.^{xxix} However, there will be many adults who achieved a level 3 qualification several years ago and want to reskill, but who are prevented from doing so by the level 3 entitlement rules.^{xxx} The Equivalent or Lower Qualifications rule (ELQ) was relaxed for apprenticeships and the government is considering the same in relation to LLE. Doing so here would help adults develop new, relevant skills.

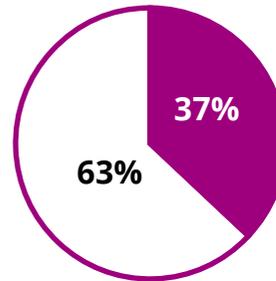
4. Ensuring LSIP success

- The development of LSIPs needs to be truly inclusive. They should draw on the experience and expertise of all sizes of employers and include the learner voice to ensure a representative view of local skills and learner need.
- There must be coherence in the development of plans including the role of Chambers, LEPs and other local skills bodies, employers, and providers.

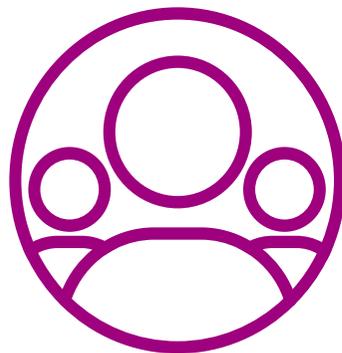
What the polling told us

In the last year, **37%** of people said they had considered further training or study at some point.

63% had not.



Almost three times as many people said they understand the qualifications employers value, than those who do not.

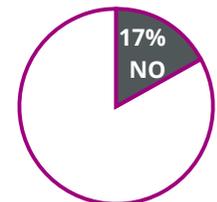
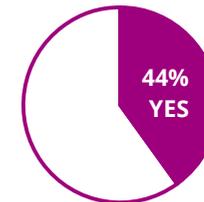


17%
don't
understand

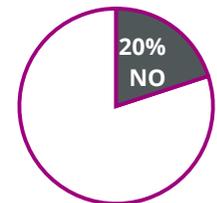
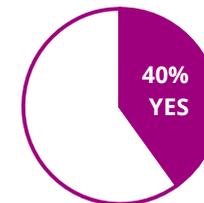


46%
understand

Of those who expressed an opinion, more people were confident of where to find qualifications to improve skills and job prospects...



... and soft skills, than those who were not confident.



34% of adults told us they know where to find funding support to career development.



This compared unfavourably with those unaware of where to look.



Policy paper 4:

Lifelong Loan Entitlement



POLICY PAPER 4: Lifelong Loan Entitlement

“I want every student with the aptitude and the desire to go to university to get the support they need, but I also want all young people to be given a real choice in life, and not to feel there is only one route to success.”

Prime Minister,
September 2020. ^{xx}

BACKGROUND

Intention and direction of travel

The policy for a lifelong loan for post-18 education was proposed in the **House of Lords Economic Affairs Committee report** (2018)¹ and the **Augar Review** of Post-18 Education and Funding (2019)². The Augar Review highlighted the Australian four year entitlement as a potential model.

In September 2020 the Prime Minister **announced a ‘Lifetime Skills Guarantee’**, which included a new Lifelong Loan Entitlement (LLE), a flexible loan to pay for higher-level education.

The **Skills for Jobs White Paper** outlined the proposed new system that will be introduced from 2025. The LLE will cover levels 4 to 6 and will create a four-year entitlement post-18 that will facilitate credit transfer, allowing learners to space out their studies and study part-time.

The government will pilot modular provision and consult institutions in receipt of both Student Finance and Advanced Learner Loans to understand how to design the new system. By doing this, the government aims to stimulate delivery and to ensure that all students, regardless of where they study, get a similar experience both in terms of access to funding and learning.

The delivery of new Higher Technical Qualifications (IFATE quality marked) is seen as a crucial step to making the Lifelong Loan Entitlement work and to deliver better outcomes. Higher Technical Qualifications will therefore need to fit into the new unified and simplified system. **The Office for Students** is investigating higher education short course provision, through funded trials, to understand ‘what works’ and how such courses can support the LLE.

POLICY PAPER 4: Lifelong Loan Entitlement

	Individual 	Institution 
Current system: Individuals entitled to one funded course per Level	Choose one full degree at the maximum fee level, since any unused loan cannot be used later.	Offer the longest courses at the highest fee level permitted. Target full time enrolments at age 18.
New system: Individual allowance to a loan amount which can be used at any time for any approved tuition at Levels 4, 5 and 6	Consider taking shorter courses, especially to start with and preserving the remaining entitlement for future use. Shop around for provision which is good but cheaper since this preserves loan entitlements for future flexible learning.	Offer more modular provision, as well as Level 4 and 5, which can be topped up later. Compete on price as well as reputation and entry requirements. Target older individuals who are retraining or changing occupation.

Source: *Post-18 education review - independent panel report 2019 (The Augar Review)*

What we heard

In June we held a policy roundtable to discuss the LLE. The key themes were:

1. Developing a pipeline of students and improving access

- Policy success will require the development of a pipeline of students, including those from levels 2 and 3. It will also need to engage those not in learning.
- Wider policy should consider the numerous barriers that prevent people from learning. Maintenance support is a key factor including the direct and indirect costs of studying.
- The policy needs to be developed within the constraints of the wider system of government. For example, LLE has to work within DWP rules. Attendees were worried that those who need help the most will not be able access the support.

2. Easy to understand & the question of debt

- LLE needs to be simple to understand and access – for learners and institutions – otherwise it will not drive participation.
- There is an aversion to debt (outside of university degrees) and more work is required to show the value of investing in lifelong learning.

3. Moving from full time degrees to a modular approach

- Participants hoped that the creation of a modular system would see a shift away from the concept of full years or courses of study.
- Modular learning could provide sectors, providers, and students with the agility to meet needs quickly, effectively, and affordably.

KEY ISSUES

Several factors currently act as a break in the system and will need to be addressed if the LLE is to be implemented successfully from 2025. Each of these issues are interlinked and co-dependent:

- **Inflexible funding for learners**

The student finance system is not currently set up to support a break in learning, to encourage more flexible modes of access and participation, or to enable credit accumulation. This rigidity of funding has driven participation post-18 (on to 3-year undergraduate programmes) and will require not just significant change to the system of finance, but also the behaviour and expectations of learners, as well as improved IAG to create this shift.

- **Student Finance changes since 2012**

The removal of the cap on student numbers and the move to higher level fees (supported by loans) has led to the increase in undergraduate numbers at the expense of sub-degree (level 4 and 5) options.

- **Stimulating the market for level 4 and 5**

The Government acknowledges the decline in study at level 4 and 5 over the last 20 years as it attempts to rebuild the status and brand of higher technical education (HTE) through the development of new Higher Technical Qualifications. Rebuilding the market for level 4 and 5 study, comparable to undergraduate programmes, will be key for the success of not just new HTQs but also the LLE.

- **Equivalent or Lower Qualifications (ELQ)**

It is widely accepted that the ELQ policy has contributed to the inexorable decline in part-time study and will likely be a continued barrier for many learners accessing any new Lifelong Loan Entitlement. The FE White Paper acknowledges that further relaxation around the rules will need to be considered to support the implementation of the LLE. ^{xxxi}

- **Decline in part-time study**

By 2018/19, fewer than one in six of all undergraduates studied part-time compared to just under half in 2003/4. There are several contributing factors to this decline, including ELQ, increased tuition fees, and the removal of financial support for students.

- **25 percent threshold**

Since 2012/13, English university students have only been eligible for student finance if they are studying at an intensity of 25 per cent or greater of a full-time equivalent course and are following a full course for a specified qualification. The implication of this policy has meant that anyone studying individual modules or short courses of less intensity are ineligible for loans. Academic research submitted to the Augar panel indicates that this has been an important factor in the decline of part-time adult learners.

RECOMMENDATIONS

Ahead of the LLE consultation being published later this year we would make the following recommendations:

1. Increasing participation

- A system that meets the needs of all students. Recognition needs to be given to the circumstances faced by potential students. Flexibility in delivery will help people fit learning in around their lives, but there also needs to be maintenance support for those who need it.
- Flexibility to support different learner profiles and circumstances. For example, under the LLE learners should be able to access funding for single modules, without having to sign up to a full qualification, allowing them to reskill/upskill to support their career development. Similarly, learners can build up to full qualifications over several years. Funding will need to reflect this flexibility.
- Supporting short courses to drive participation. We have found that making available our short, 15-credit courses (HN Flex) allows students to access learning anytime/anywhere, and fits around their other commitments. The key for any new LLE modular funding for adults is making course provision that is short enough to drive participation. ^{xxxii}

2. Value and recognition

- Provision at level 4 and above needs to be designed within a common framework, referenced to HE Benchmarks, such as the FHEQ, and built upon a commonly agreed credit framework. This will allow learners and employers to better understand value, and support learners to progress to higher levels.
- Student achievement needs to be visible and have currency to ensure progression outcomes. If someone completes a number of different short courses, what does this mean? How will employers understand their worth?

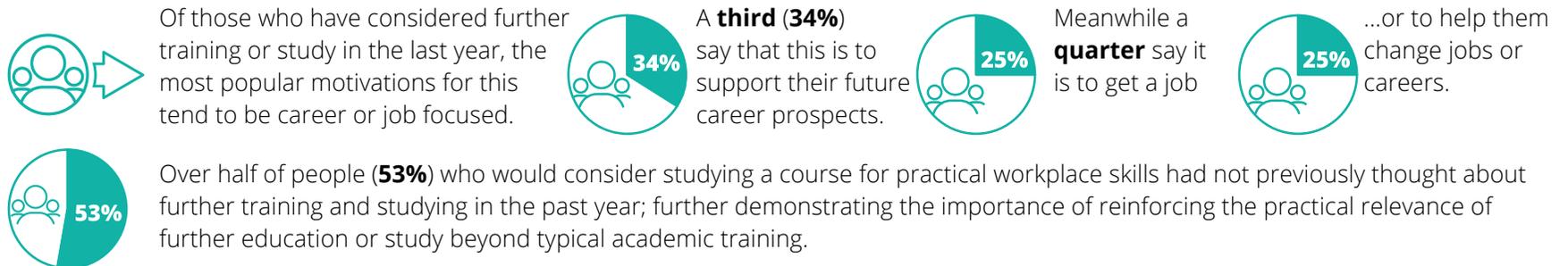
3. Student Finance

- Student funding rules should be relaxed to support smaller modules. The minimum eligibility criteria for individual funding should be 15 credits (60 guided learning hours), less than the 30 credits recommended by the Augar panel. Opting for smaller units would require a relaxation of funding rules to allow access to Student Finance.
- Amend ELQ to support reskilling. Learners should also have the option to complete a traditional 3-year undergraduate pathway by 21, and then use the rest of their allowance at any time in the future on a further level 4 or 5 programme to support reskilling. This would require a change to the current ELQ rule which we would support to enable access to Student Finance.

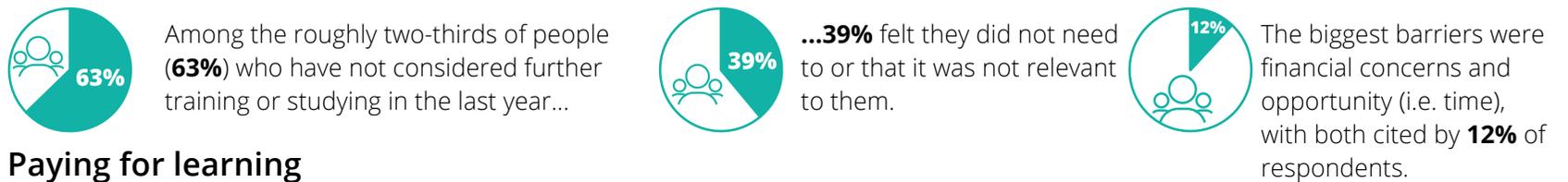
What the polling told us

In July, we undertook national polling of working age adults, asking questions around barriers to study and attitudes towards funding:

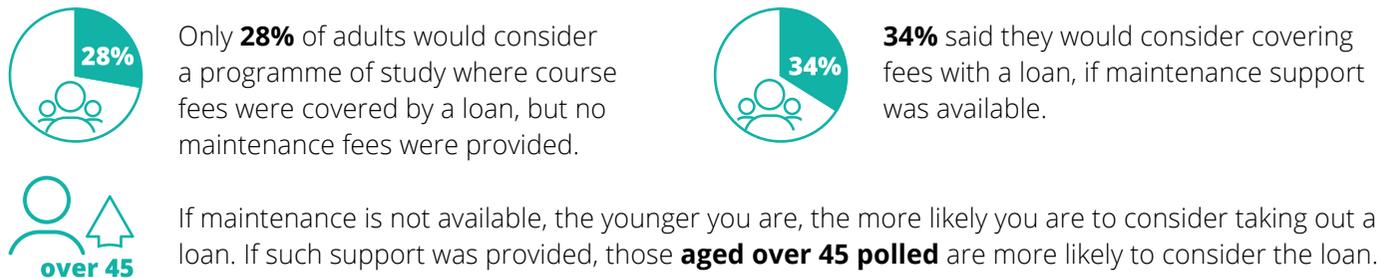
Motivations for learning



Reasons for not learning



Paying for learning



Summary of recommendations

Policy Paper 1: 16-19 qualifications

1. Retain qualifications that support key sectors in the economy.

BTEC courses offer a good foundation for learners to study higher technical and vocational courses to secure qualifications at level 4 and above, needed to enter the labour market. These support key sectors such as nursing and science. They are valued by employers, universities, and learners alike.

2. Protect learner choice and opportunity.

There is the need to maintain choice to support learner progression, including qualifications that delay specialisation. With the removal of high quality qualifications and no proven alternative, many students will be left without opportunities for progression and no suitable options at level 3.

3. Address the negative impact of reform on disadvantaged students.

Those from SEND backgrounds, Asian and Black ethnic groups, disadvantaged backgrounds, and males all more likely to be negatively affected by the removal of level 3 qualifications. In addition, many learners could struggle to obtain the English and maths requirement of T Levels.

4. Slow down the speed of reform.

Under current plans a huge number of high-quality qualifications that support learner progression to employment and to higher education will be withdrawn before the relevant T Levels have been given sufficient time to become established. If all stakeholders are not aware of or able to deliver to current timelines, there is a risk to the reputation of T Levels.

Policy Paper 2: Higher Technical Education

- 1. Ensure that the design of HTQ is undertaken within the context of UK higher education.**
Build the recognition between 'academic' and 'technical' routes and acknowledge that a number of degrees are also technical. e.g. HTQ in engineering.
- 2. The design of HTQ should consider reference to HE Benchmarks such as the FHEQ.**
Without this progression opportunities for learners to higher level study could be reduced, and the implementation of modular HE/HTQ and LLE funding will be problematic.
- 3. Consider how approving HTQ against occupational standards risks gaps in HTQ provision where there are no occupational standards.**
This could mean increasing the number of standards which may undermine the government's objective to simplify landscape.
- 4. Feedback to support the continuous improvement of quality standards**
The public consultation feedback that IFATE collect relating to individual Awarding Organisations' (AO) HTQ submissions should be shared confidentially with the relevant AOs (anonymising feedback).
- 5. Ensure alignment between Professional, Statutory and Regulatory Bodies (PSRB) and DfE & IFATE.**
Having the backing of professional bodies will help support the acceptance of HTQs with learners and employers.
- 6. Consider the effect of the complex overlaying of the IFATE approval process with the existing regulatory requirements of the OfS/Ofqual.**
Any additional bureaucratic burden and cost (e.g. increased development, validation, and approval timelines) could lead to a less efficient market for these qualifications.
- 7. Provide clarity of funding arrangements.**
Understanding funding levels for all level 4/5 qualifications will enable providers to properly engage with HTQs.
- 8. Ensure that funding supports the delivery of flexible and modular provision.**
This would encourage and enable agile provision from providers to meet local needs and support greater uptake of HTQs.
- 9. The government's focus should be on building the visibility and profile of HTQs.**
It should highlight the economic and personal value that HTE can bring to the individual and the economy.

Policy Paper 3: Lifetime Skills Guarantee

1. Broaden the focus of the entitlement to level 2 and below.

Although welcome, the level 3 entitlement does not go far enough. To ensure that there are sufficient people able to take up the entitlement, there has to be a broader focus including level 2 and below. With six million adults not achieving level 2, the social and economic benefits of a level 2 qualification (and potentially beyond) are clear and well-evidenced, as shown by the work of the Education Select Committee.

2. Cross government policy has to recognise and address the different barriers that prevent adults from engaging in learning or training.

Maintenance funding rules need to be flexible in order to provide the support adults require. Qualification design and delivery must be able to fit around people's lives.

3. Individuals should be entitled to an additional level 3 qualification.

This entitlement would need to meet local skills needs and be prescribed through the LSIP.

4. The development of LSIPs need to be truly inclusive.

They should draw on the experience and expertise of all sizes of employers and include the learner voice, as in other countries, to ensure a representative view of need.

Policy Paper 4: Lifelong Loan Entitlement

1. A system that meets the needs of all students.

Recognition needs to be given to the circumstances faced by potential students. Flexibility in delivery will help people fit learning in around their lives, but there also needs to be maintenance support for those who need it.

2. Flexibility to support different learner profiles and circumstances.

For example, under the LLE learners should be able to access funding for single modules, without having to sign up to a full qualification, allowing them to reskill/upskill to support their career development. Similarly, learners can build up to full qualifications over several years. Funding will need to reflect this flexibility.

3. Supporting short courses to drive participation.

We have found that our short, 15-credit courses (HN Flex) allow students to access learning anytime/anywhere, and fits around their other commitments. The key for any new LLE modular funding for adults is making course provision that is short enough to drive participation.

4. Provision at level 4 and above needs to be designed within a common framework.

It should be referenced to HE Benchmarks, such as the FHEQ, and built upon a commonly agreed credit framework. This will allow learners and employers to better understand value, and support learners to progress to higher levels.

5. Student achievement needs to be visible and have currency to ensure progression outcomes.

If someone completes a number of different short courses, what does this mean? How will employers understand their worth?

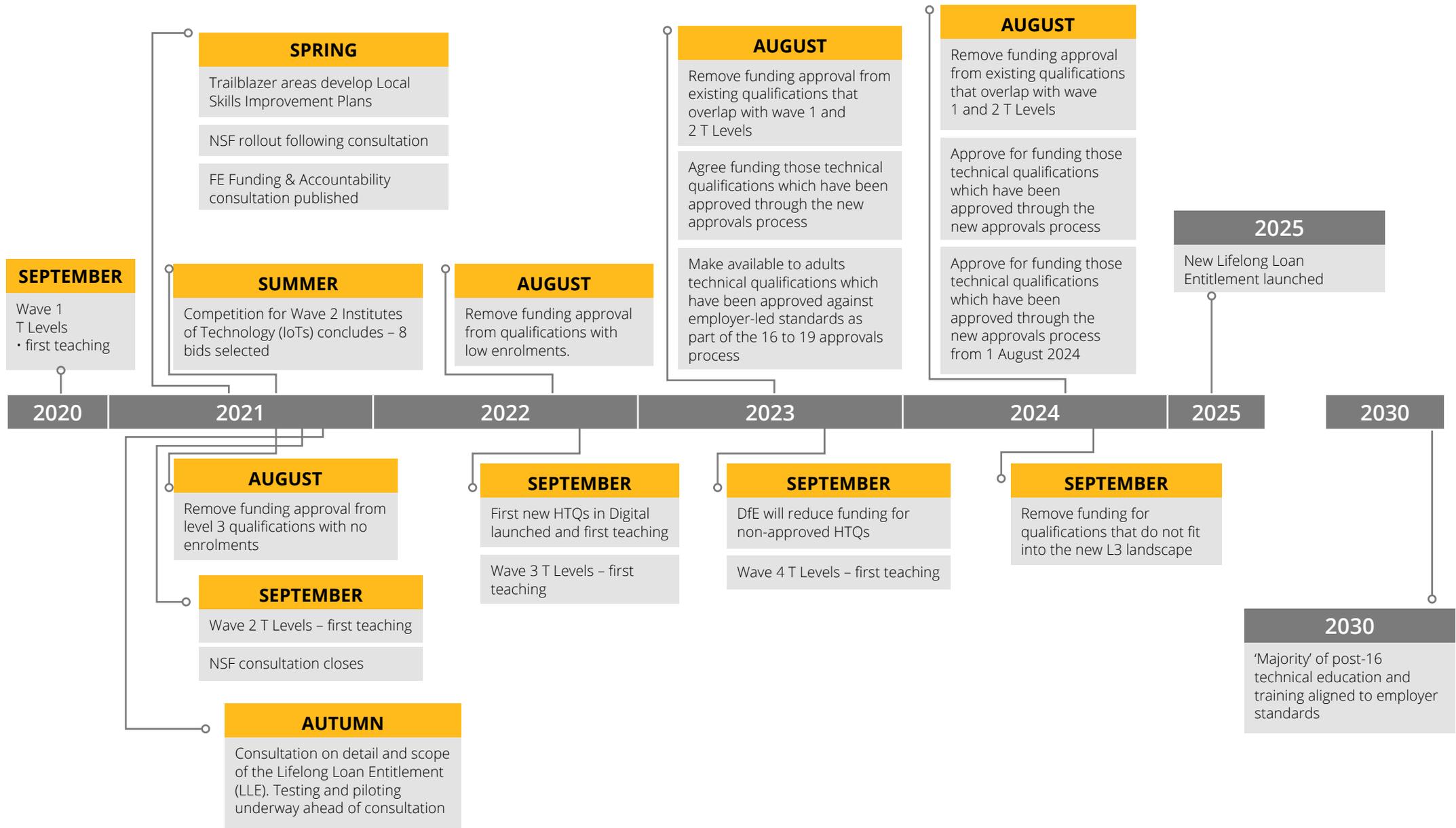
6. Relaxing student funding rules to support smaller modules.

Modules eligible for individual funding should be for a minimum of 15 credits (60 guided learning hours), less than the 30 credits recommended by Augar. Opting for smaller units would require a relaxation of funding rules to allow access to Student Finance.

7. Amend ELQ to support reskilling.

Learners should also have the option to complete a traditional 3-year undergraduate pathway by 21, and choose to use the rest of their allowance at any time in the future on a further level 4 or 5 programme to support reskilling. This would require a change to the current ELQ rule to enable access to Student Finance.

Indicative timeline of post-16 skills reform



Methodology

We held six policy roundtables between April and May 2021, investigating four policy areas. The series was chaired by former Skills Minister, Rt. Hon. Anne Milton. Each event ran for 1.5 hours and included education providers, higher education institutions, employers, politicians, and local government.

Event 1: Practical implications of qualification reform for the North West

Event 2: Level 3 courses supporting emerging sectors in the South West

Event 3: Higher Technical Qualification reform: occupational standards meeting the needs of the local economy in the North East

Event 4: Creating a pipeline for Higher Technical Education in the Midlands

Event 5: Level 3 and below Adult Offer/LSIPs - East Anglia, Yorkshire, London, and South East

Event 6: Lifelong Loan Entitlement – National

As part of this six-month project we ran a series of independent public polls on four policy areas.

Questions on post-16 education, motivations, barriers, and financial support as part of a Savanta Omnibus survey.

- Savanta surveyed 2,233 UK adults aged 16+ online between the 23rd and 25th July 2021. Data were weighted to be nationally representative of UK adults aged 16+ by age, gender, region, and social grade.

'Your Future Your Choice' - Research on student, parent, and employer sentiment on the future, carried out by Censuswide.

- Polling was carried out between 27.11.2020 - 02.12.2020 with the following participants:
 - 1,000 14-18-year-olds that are currently doing a BTEC, a combination of A levels and BTEC, a vocational course or an apprenticeship
 - 1000 respondents aged 19+
 - 1,006 employers aged 18+
 - 1,000 parents with children who are aged 14-18 that are currently doing a BTEC, a combination of A Levels and BTEC, a vocational course or apprenticeship

Acknowledgments

We are grateful for the following people's time in attending the policy roundtables and wider engagement with the project. Their insights have been instrumental in shaping these reports. The final recommendations are our own and are not intended to reflect the views of individuals or organisations.

Rt. Hon. Anne Milton	Series chair and former Skills Minister
Alison Ward	New Anglia LEP
Andy Firth	Liverpool City Region
Angela Foulkes	Sheffield College
Angela Ringguth	CIBSE
Ann Marie Spry	Leeds City College/Luminate Education Group
Arti Saraswat	Association of Colleges
Chester King	British Esports
Chinara Rustamova	Federation of Small Businesses
Chris Nicholls	Association of Colleges (North East, Yorkshire and Humber)
Clare Harris	Cornwall LEP
Colin Booth OBE	Mixed Economy Group
David Corke	Association of Colleges
Deepa Jethwa	Sixth Form Colleges' Association
Dominic Martinez	Gatsby
Ellen Thinesen	City of Sunderland College
Fiona Aldridge	Learning & Work Institute
Gayle Aughton	Midlands Engine
Georgina Barnard	Institute of Technology (Dudley College)
Gerry Ruffles	MOBIE
Ginny Page	Gatsby Foundation
Helen Hart	Devon & Plymouth Chamber of Commerce
Iain Murray	TUC
Ian Ashman	Consultant

Ian Hatt	Wiltshire College & University Centre
Ian MacKinnon	Maritime Skills Alliance
Jacqui Gladwin	Health Education England
James Daly MP	Conservative MP for Bury North
Jamie Bytheway	Manchester NHS Foundation Trust
Jenifer Burden	Gatsby Foundation
Jo Grenfell	Wiltshire College & University Centre
Jon Nicholls	Reading UTC
Jon Ridley	Newcastle College
Joy Williams	Institute for Employment Studies
Kate Ambrosio	Baker Dearing Trust
Kate Tague	WMG Academy for Young Engineers (UTC)
Kenneth Cornforth	Baker Dearing Trust
Kerry Harrison	Lancashire LEP
Kim Smith	North East LEP
Lord Blunkett	Former Secretary of State for Education
Lucy Hunte	Health Education England NHS
Lydia Amarquaye	IMECHE
Malcom McBain	Tyne Coast College
Marianne Cutler	Association for Science Education
Mark Claydon	Trustec
Martino Picardo	Bionow
Matt Harbour	South West College
Matthew Pointon	TUC Midlands

Matthew Sadler	Staffordshire University
Megan Nichols	New College Durham
Melanie Wilkes	Work Foundation
Michael Natzler	HEPI
Mike Cox	RICS
Mike Hill	Carmel SFC, St Helens
Natasha Eason	CIMPISA
Nick Sturge	Institute of Directors (South West)
Paul Ashby	GKN Aerospace Services Limited
Peter Aldous MP	Conservative MP for Waveney
Prof Christine Horrocks	Manchester Metropolitan University
Richard Holden MP	Conservative MP for North West Durham
Rob Newby	Skills for Care
Robert Wiltshire	Software Cornwall
Rosalind Thorpe	CIOB
Rowan Fisher	UUK
Ruth Ding	CMI
Sally Challis-Manning	Chichester College
Sally Dixon	Education Partnership North East
Sara White	City of Sunderland College
Simon Ashworth	Association of Education and Learning Providers
Thomas Gunter	Royal Academy of Engineering
Yvonne Kelly	Barking and Dagenham College

Endnotes

- i We have taken the decision not to focus on apprenticeships in these papers. Significant reform is some way down the track, including different funding arrangements via the levy. We may consider apprenticeships as part of a future Spotlight paper but given the recent amount of research and comment (including the **Independent Apprenticeship Policy Group we sponsored in 2020**) we have chosen to focus on substantive reforms that are at a critical nascent stage and which are all interdependent.
- ii Review of vocational education: the Wolf report 2011: <https://www.gov.uk/government/publications/review-of-vocational-education-the-wolf-report>
- iii **Lord Baker (Former Secretary of State for Education)** has described the government's plans to defund the majority of AGs as "vandalism". <https://www.theguardian.com/education/2021/jul/29/kenneth-baker-scrapping-btecs-act-of-vandalism>
- iv Department for Education: <https://www.gov.uk/guidance/16-to-19-funding-high-value-courses-premium>
- v The government's own analysis shows that the most disadvantaged students are twice as likely to be enrolled on qualifications likely to be withdrawn than the least disadvantaged. See DfE Impact Assessment: Review of post-16 qualifications at level 3 in England <https://www.gov.uk/government/publications/review-of-post-16-qualifications-at-level-3-in-england>
- vi The Association of Colleges suggests 1 in 5 T Level students may not achieve the requisite level in English and/or maths: <https://www.aoc.co.uk/news/gov-needs-to-slow-down-defunding-of-qualifications>
- vii DfE <https://www.gov.uk/government/publications/review-of-post-16-qualifications-at-level-3-in-england> & FFT Education Datalab <https://ffteducationdatalab.org.uk/2018/11/long-term-outcomes-how-did-life-turn-out-for-those-who-took-level-3-btec-qualifications/>
- viii Research by the **National Education Opportunities Network (NEON)** suggests that level 3 qualification reform will "set access to HE back at least 5 years". <https://www.educationopportunities.co.uk/news/new-report-shows-level-3-qualification-reform-will-set-access-to-he-back-at-least-5-years/>
- ix HESA dataset available on request from Pearson
- x **The Federation of Awarding Bodies** has pointed out that the economy requires a number of qualifications to serve its diverse requirements: "The notion in a British economy, with over 75,000 different job roles currently available, that the number of qualifications made available can be reduced to a mere handful is fanciful. If policymakers listened to parents, learners and college community leaders, as much as to employers, they would know that". <https://awarding.org.uk/fab-statement-on-the-post-16-review-of-qualifications-at-level-3/>
- xi Applied General qualifications overall contribute £180m annually according to Ofqual annual report from Feb 21 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/960952/Annual_Qualifications_Market_Report_academic_year_2019_to_2020.pdf
- xii **Lord Blunkett (Former Secretary of State for Education)**, tabled an amendment to the Skills and Post 16 Education Bill, that questioned the impact that removing qualifications will have on limiting choice, and the possible low threshold for judging a qualification as a duplicate of another. Lord Willetts (Former Universities Minister) also expressed concerns that the diversity of qualifications won't be retained and that changes "do not serve the long-term interests of the economy or individual learners." [https://hansard.parliament.uk/Lords/2021-07-15/debates/708AB345-8243-45B0-A450-F68B88D19BAE/SkillsAndPost-16EducationBill\(HL\)#contribution-55A7DC74-0DA9-4090-A0A8-A3DCB2C3EC2A](https://hansard.parliament.uk/Lords/2021-07-15/debates/708AB345-8243-45B0-A450-F68B88D19BAE/SkillsAndPost-16EducationBill(HL)#contribution-55A7DC74-0DA9-4090-A0A8-A3DCB2C3EC2A)

Endnotes (continued)

- xiii **JCQ (The Joint Council of Qualifications)** is worried about the impact of reform on sectors of the economy, in particular as they recover from the impact of the pandemic.
<https://www.jcq.org.uk/wp-content/uploads/2021/08/JCQ-Statement-Post-16-Outcomes.pdf>
- xiv This is a key theme of the **Protect Student Choice** campaign, a coalition of education bodies representing staff and students in schools, colleges and universities (<https://www.sixthformcolleges.org/1022/protect-student-choice>): *“For many young people, AGQs (taken alongside A levels or as part of a standalone study programme) will be a more appropriate route to support progression to higher levels of study or a meaningful job, than an A level or T level-only study programme. Although AGQs are often available in similar subjects, they are a different type of qualification that provide a different type of educational experience – one that combines the development of skills with academic learning.”*
- xv The **Protect Student Choice campaign**, in its letter to the Secretary of State, expressed the concern that removing funding for BTEC qualifications *“will leave many students without a viable pathway at the age of 16 and will hamper progress to higher education or skilled employment”*.
<https://sfcawebsite.s3.amazonaws.com/uploads/document/0621-Joint-Position-Statement-on-AGQs-Final1.pdf>
- xvi **Ofqual**, in its response to the second phase consultation, pointed out: *“some learners, including those with SEND or caring responsibilities, may find T levels less well-suited, too big or not sufficiently flexible for their individual study needs.”*
<https://www.gov.uk/government/publications/qualifications-review-consultation-response/qualifications-review-consultation-response>
- xvii This is an argument supported by the **Association of Colleges** (<https://www.aoc.co.uk/news/gov-needs-to-slow-down-defunding-of-qualifications>) and **JCQ** (<https://www.jcq.org.uk/wp-content/uploads/2021/08/JCQ-Statement-Post-16-Outcomes.pdf>). **Ofqual** has also suggested DfE consider a *slightly more extended period of implementation* (in the face of a global pandemic). The **Labour Party** has also express concern over the government’s haste in removing funding from AGQs. Toby Perkins MP (Shadow Minister for Further Education) said: *“The Government’s alternative T-Level qualifications are currently unproven and a hasty charge to abolish level 3 BTECs would be hugely irresponsible.”* (<https://labour.org.uk/press/labour-responds-to-todays-btec-results/>)
- xviii **CBI** <https://www.bbc.co.uk/news/education-48599333>
- xix The results of **Ofqual’s** annual survey on perceptions of vocational and technical qualifications in England.
<https://www.gov.uk/government/news/perceptions-of-vtq-in-england-wave-4>
The **Confederation of British Industry (CBI)** has previously expressed concerns that employers will not be able to provide the placements necessary to ensure T Level programmes are able to function (<https://www.cbi.org.uk/media/3095/cbi-response-to-t-level-consultation.pdf>)
- xx <https://www.gov.uk/government/speeches/pms-skills-speech-29-september-2020>
- xxi Department for Education: Higher technical education: the current system and the case for change
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907144/Higher_technical_education_-_the_current_system_and_the_case_for_change.pdf
- xxii Héctor Espinoza, Stefan Speckesser, Imran Tahir, Jack Britton, Sandra McNally & Anna Vignoles’ blog for HEPI
<https://www.hepi.ac.uk/2021/06/14/are-level-4-and-5-qualifications-a-good-investment/>

Endnotes (continued)

- xxiii *"Micro-management of qualifications destroys the major arguments in favour of awarding bodies' existence – their ability to respond directly and effectively to specialised markets (including employment ones) and their ability and motivation to innovate. At the same time, concentrating government intervention on qualification design leads repeatedly to officials and agencies concentrating on paperwork rather than on direct safeguards of quality and standards in assessment, which cannot be checked by sitting at a desk and reading submissions."* Review of vocational education: the Wolf report
<https://www.gov.uk/government/publications/review-of-vocational-education-the-wolf-report>)
- xxiv Value of Level 4/5 qualifications <https://www.hepi.ac.uk/2021/06/14/are-level-4-and-5-qualifications-a-good-investment/>
- xxv **Learning and Work Institute** has published several pieces of research on this issue. Its 2018 report *Barriers to learning for disadvantaged groups* highlighted the range of situational, institutional and dispositional barriers people faced.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/735453/Barriers_to_learning_-_Qualitative_report.pdf
Its 2021 report, *Decision making of adult learners below level 2*, reiterates many of the points regarding barriers https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962404/Decision_making_of_adult_learners_below_level_2.pdf
- xxvi Education Committee report on *A plan for an adult skills and lifelong learning revolution*, followed an inquiry which included oral and written evidence from a range of stakeholders.
<https://committees.parliament.uk/work/234/adult-skills-and-lifelong-learning/publications/>
- xxvii IFS *Further education and sixth form spending in England*, <https://ifs.org.uk/publications/15578>
ONS report <https://www.nao.org.uk/report/financial-sustainability-of-colleges-in-england/>
- xxviii **The CBI** recognises the importance of modular and flexible delivery to help drive adult participation
<https://www.cbi.org.uk/articles/cbi-responds-to-department-for-education-s-consultation-on-level-3-qualifications/>
- xxix **Department for Education**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762080/Labour_market_impact_of_progressing_more_learners_to_Level_3.pdf
- xxx **The IFS** in its analysis of the government's Skills for Jobs White Paper called for a relaxation of the ELQ rules to enable more retraining.
<https://ifs.org.uk/publications/15404>
- xxxi **Lord Johnson, Former Universities Minister**, made this point during debate in House of Lords 21 July 2021
[https://hansard.parliament.uk/Lords/2021-07-21/debates/E424F5A3-8224-42E3-B285-2B5558CEF2D5/SkillsAndPost-16EducationBill\(HL\)#contribution-2D84DB61-B7FC-493D-A636-776D56FCE92E](https://hansard.parliament.uk/Lords/2021-07-21/debates/E424F5A3-8224-42E3-B285-2B5558CEF2D5/SkillsAndPost-16EducationBill(HL)#contribution-2D84DB61-B7FC-493D-A636-776D56FCE92E)
- xxxii **The Learning and Work Institute** highlighted the value of HN Flex in being able to respond to employer need and to support the growth in the market for HTE
"Making a market for the missing middle: Higher technical education" February 2021
West London Institute of Technology on HN Flex
<https://www.harrow.ac.uk/news/21798-undergrad-bitesize-courses-wliot.html>

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