

Post-16 Level 3 Review – Stage 2

Pearson response: Executive summary

1) A post-16 qualification system needs to serve multiple purposes, and needs choice in qualifications to support this. A wider range of qualifications should continue to be funded alongside T Levels and A levels

The proposals set out a limited choice for young people, and potentially for adults, and we are concerned that they will not be sufficient to provide the broad range of high quality and useful qualifications needed in a 16-19 and adult system that works for all.

The binary choice is problematic

The proposals are based on binary choice between 'technical' and 'academic' routes and each has been described as have a primary progression purpose – i.e., to employment or to higher education, respectively. This is problematic and undermines the value of vocational education which can lead directly to employment or to employment via higher education which supports higher level skills needs. Qualification routes should describe the skills and knowledge the qualifications develop rather than be defined by a primary progression route – whether occupational, more broadly vocational, or general.

The term 'overlap' needs to be defined so that it is not so broad that it will narrow and limit choice

The proposals are based on a definition of overlap between current qualifications and existing A levels, and new T Levels. The precise definition is not yet clear, and we will need detailed information to sensibly respond, however, on the information we currently have, we are concerned that the definition of overlap could be overly broad. Any definition of overlap should consider purpose, size, content, and assessment. If the definition of overlap continues to be broad, the result will be that learner cannot take a broad vocational pathway and will not have the opportunity to take technical or vocational qualifications alongside general (academic) qualifications to follow a mixed broad pathway. This will both narrow and limit choice.

The regional limitations of T Levels need to be considered and their links to apprenticeships could be better utilised

Any future proposals for removing funding also need to take regional opportunities into account. Even where the T Level option is the right choice for a learner, access and progression will be restricted for learners in regions where job placements are not available but who may intend to relocate for employment after their 16-19 or higher education. Given the link to the employer-led standards, their link to proximate skills needs, and the recent fall in numbers of young people finding apprenticeship places, T Levels should be aligned and structured to support the growth of young people following the apprenticeship route and be available alongside other choices at 16-19.

Proposals for a broader range of qualifications for adults are broadly welcome, but summative assessment may not be appropriate for all qualifications, and adults will need access to short bitesize training

We broadly welcome the proposals set out for adult qualifications. We welcome the recognition in the consultation that adults will need a far broader range of qualifications. We welcome the approach to not remove funding for qualifications for adults that overlap with T Levels in 2023, and to instead review and approve them for teaching from 2024. We agree with the proposals to support the many adults who will be studying qualifications to upskill or reskill, and we welcome the flexibility in approving qualifications that are aligned to occupations outside the current scope of the occupational maps and qualifications focused on cross-sectoral skills.

We would stress that quickly changing skills needs mean that adults will, more than ever, need access to shorter programmes of learning. We need to be thinking about how we support short, bitesize training to allow individuals and employers to upskill and reskill.

We do not agree with the approach to switching off qualifications that are seen to overlap with A levels in line with the approach for qualifications for 16-19-year-olds, and do not think that summative assessment is necessary for all qualifications in an adult system.

2) There is a strong risk of severe disruption to a system that works for learners, higher education, and employers

The number of relevant qualifications in the system is about the same as the number of A levels and apprenticeship standards

The Review states that there are 'more than 12,000 different qualifications funded in England at level 3 and below'. However, on analysis, 558 are relevant qualifications at level 3 – i.e. full time, graded, classroom-based qualifications on Performance Tables and/or the UCAS Tariff. This is comparable with the number of available academic qualifications and apprenticeship standards of which there are 540 and 597 respectively. It would seem acceptable to have a similar number of level 3, vocational, full-time, graded, classroom-based qualifications available.

High-quality qualifications that work are at risk

Whilst we agree that it is right to assess whether all qualifications are needed, we must be mindful about the consequences of disrupting and damaging the current system. The large numbers of learners taking BTECs mean that this risk is particularly acute with these qualifications. BTECs are taken by over 1m learners a year in schools and colleges around the country. The consequences of risking these qualifications would be severe.

As the Review document notes, significant recent changes have been made to qualifications in recent years. Care should be taken to ensure that decisions reflect recent changes to qualifications and are based on up-to-date information.

We support the DfE's intention to enhance the clarity of the qualification offer, but it is important to ensure opportunities remain that reflect the breadth of knowledge and skills needed across industry. Vocational qualifications that develop broad knowledge and understanding of an industry need to be available alongside qualifications developed to focus specifically on roles that meet current and historic industry requirements to prepare employees for the future. It would be advisable to work to ensure that choices are clearer rather than remove valuable qualifications. Many of the BTEC qualifications have been identified by the DfE as 'High Value Courses' as they lead to higher wage returns, support the Industrial Strategy, and are most likely to enable a more productive economy.

The narrowing and limiting of choice will have a negative impact on all learners and on particular groups of learners, and on higher education, employers, and the economy

- **Access and participation:** It is estimated that around 3 or 4% of 16- to 19-year-olds currently studying at level 3 may not be able to progress directly to level 3 study following the reforms. 400,400 16–19-year-olds, out of a total 2,738,800, take qualifications 'expected no longer to be available' which accounts for around 15%. In addition, many learners will struggle to obtain the English and maths requirement and therefore be prevented from accessing level 3 and this will be exacerbated by increasing numbers staying on at 16 due to the COVID pandemic. In a typical year, around 100,000 16-18-year-olds would study towards an English resit qualification, and 150,000 study towards a maths resit qualification. There could be an additional 119,000 thousand 16- or 17-year olds required to continue with these subjects next year. Recruitment criteria for T Levels has required good attainment in both English and maths.
- **Wage returns and employment prospects:** Evidence shows that higher levels of qualifications are associated with higher earnings and better employment prospects. These learners may also find themselves no longer able to progress onto HE and accrue the significant average benefits to wage and employment returns.
- **Diversity and inclusion:** Learners with SEN, from Asian and black ethnic backgrounds, males, and those from disadvantaged backgrounds are all more likely to be negatively affected by changes to level 3 qualifications available in the future.
- **Higher level skills, diversity, and inclusion of higher education, and supporting higher level skills needs:** The proposals would have a negative impact on thousands of individuals progressing to higher education each year. BTEC Nationals are accepted by over 150 UK higher education institutes and an increasing number of learners are entering higher education with BTEC qualifications. Around one in four learners enter higher education with a BTEC

qualification, i.e., over 100,000 a year. 243,000 entered with A level only. This is a major driver behind increasing access to, and diversity and inclusion of, higher education. HESA data shows that a greater proportion of those entering higher education who followed the BTEC route come from an ethnic minority background when compared with A levels (17% Asian and 14% Black and 12% Asian and 5% Black respectively) and that a greater proportion of those entering higher education who followed the BTEC route come from the bottom four socio-economic groups when compared with A levels (32% from the bottom 4 socio-economic groups and 17% respectively). There is a serious risk that the proposals would reverse recent trends to widen diversity and broaden inclusion. BTECs support all learner groups and under the proposals future higher education learner cohorts could be far less diverse and inclusive. BTEC courses offer a good foundation for learners to study higher technical and vocation courses in order to secure qualifications at Level 4 and above, needed to enter the labour market for some occupations. In some large employment sectors such as nursing and sports sciences larger BTEC qualifications are preferred by many institutions, including selecting universities as being equivalent to, or better than A Levels as preparation for some degrees.

- **Employment and the UK economy:** The current system of qualifications supports a low level of labour market imbalance in the UK; evidence that the UK is more efficient than others when it comes to reacting to skill challenges and matching the supply and demand of workers' skills in the labour market. Limiting the development of all qualifications to employer-led standards will not allow for the flexibility and agility needed to meet newly emerging demand.

The proposals will cause further disruption in a time of unprecedented change

This ambitious reform programme is taking place during and after a significant disruptive period of change with both COVID-19 and Brexit having profound structural effects on the UK economy and labour market as the COVID-19 crisis continues to speed up existing trends and drive new ones. At a time of serious disruption, having a flexible and varied education, skills and training landscape is vital. This means having a variety of accreditation options to choose from plus curriculum and standards that are responsive to change and open to innovation.

The proposals risk the reputation and recognition of vocational qualifications as a valued global export

BTECs are an important and highly regarded export. BTEC is taught and recognised in more than 80 countries around the globe and the Department for International Trade has been instrumental in supporting Pearson develop relationships in Thailand, ASEAN, Middle East, Latin America, and other markets to drive the value of BTECs.

Disruption of the qualifications system across the devolved administrations

The question of qualification alignment across the devolved administrations needs to be taken into consideration. Removing funding from certain qualifications in England could limit the availability of qualifications in these administrations as awarding bodies cannot continue with the same offer. We would urge the Department to engage closely with the devolved administrations on the removal of any funding, and to manage the impact.

Any transition needs to be managed carefully, over a longer period, and new qualifications need to be shown to be working

The transition to any new offer needs to be managed carefully. There is a clear risk of disruption unless change is phased carefully and should not be underestimated. The detailed criteria for the removal of funding for qualifications, and the approval of new qualifications would need to be confirmed as soon as possible if the switch off date is from 2023 and 2024 as proposed. In addition, any move to new qualifications needs to be based on evidence that they are better, or at least as good as, existing qualifications, at supporting learner outcomes.