

# **Pearson Response**

## **Post-16 Level 3 Review**

### **31 January 2021**

## **Introduction to Pearson and our response to the Review**

Pearson fully supports the government's ambition and commitment to raising the status of technical and vocational education and we are delighted to have the opportunity to respond to this Review of Post 16 Qualifications at Level 3.

Pearson is a global learning company with 35,000 employees across 70 countries worldwide. Our insight and expertise is borne out of our long history of working closely with teachers, learners, researchers, authors, and thought leaders. Our products, content, and services are used by millions of teachers and learners around the world every day. They are designed to help people adapt to our changing world, navigate its challenges and opportunities, and make progress in their lives. We want to improve access and outcomes in education for learners across the globe and do this by combining expert content and assessment, powered by our services and technology. Successful examples include content and platforms such as MyLab and Bug Club; assessments including GCSEs, A levels, BTECs, and Apprenticeships; and services like Pearson VUE, Connections, and English Language centres. Our aim is to help everyone, everywhere, to learn throughout their lives.

We are committed to working with government and the wider stakeholder community to ensure the qualifications we provide help equip individuals of all ages with the knowledge and skills they need for work and for life. We have been encouraged by the higher profile afforded to T Levels and Apprenticeships over the recent past. We welcome the continued opportunity to contribute to the development of a simplified offer for 16 to 19 learners at level 3 with the introduction of the new T Level qualifications, and to look at the broader qualification landscape for qualifications for all age learners at all levels.

However, we have several concerns with the proposals as they are set out. We have provided as much evidence as possible in our 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.

**Q1. What s your name?**

Siân Owen

**Q2. What is your email address?**

sian.owen1@pearson.com

**Q3. What is your role, or in what capacity are you responding?**

On behalf of an organisation.

**Please select the term that best describes your interest in this consultation**

Awarding organisation

**Q4. If you are responding on behalf of an organisation**

**Please tell us the full name of your organisation**

Pearson

**What type of organisation is it?**

Awarding organisation

**Q5. Would you like us to keep your responses confidential?**

No.

**Q6: Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16-to-19-year olds choosing technical provision?**

No.

The qualifications will not be sufficient to provide the broad range of qualifications needed in a 16-19 system that works for all.

We disagree with the proposal that the qualifications outlined in paragraph 45 are the only qualifications that should remain available in the new landscape for 16-19-year-olds alongside T Levels. We do agree that these groups of qualifications would be useful in the 16-19 landscape, but they should be made available alongside a broader range of qualifications.

Given the proposal to remove funding approval for qualifications that overlap with T Levels, the remaining qualifications (alongside T Levels) will not be sufficient to provide the broad range of high quality and useful qualifications needed in a 16-19 system that works for all.

- They will not offer learners a broad vocational pathway or the opportunity to take technical or vocational qualifications alongside general (academic) qualifications in order to follow a mixed broad pathway.
- The narrowed and limited choice will have a significant impact on access and participation, progression, and wage returns and employment prospects for individuals, diversity and inclusion, higher level skills, on employer skills needs in a changing economy. Removing funding approval for all qualifications that overlap with T Levels will result in a qualification system that cannot meet the needs of a constantly evolving jobs market in which automation and technological advances are accelerating. The resulting skills gaps will damage the economy.
- Whilst affecting all learners wanting to follow a technical or vocational route, it will particularly affect specific and protected groups.

We do agree that these two groups of qualifications would be useful in the 16-19 landscape, but they need to be made available alongside a broader range of qualifications.

We give further details in our response to other questions in the consultation.

**Q7: Do you agree with the funding criteria described in paragraph 47 for the other technical qualifications we propose to fund for 16-to-19-year olds (qualifications providing occupational competence against employer-led standards which are not covered by T Levels and additional specialist qualifications)?**

No.

The criteria will not support the broad range of qualifications needed in a 16-19 system that works for all.

Given the proposal to remove funding approval for qualifications that overlap with T Levels, the criteria for these qualifications will not be sufficient to provide the broad range of high quality and useful qualifications needed in a 16-19 system that works for all.

We are particularly concerned that the criteria do not mention progression to higher education. Many learners taking technical and broader vocational qualifications can and do progress to higher level qualifications that support their career ambitions and are crucial to meet the changing skills needs of the economy.

We give further details in our response to other questions in the consultation.

**Q8: Should the Institute create additional T Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s)/occupation(s) and explain why.**

Yes.

Where there is employer evidence, additional T Level pathways could be created.

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

**Q9: a) Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52 to 66? b) Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?**

a) No.

The definition of overlap needs further detail and could be overly broad. This will have severe consequences for learners, higher education, and the economy.

It is difficult to answer this question in full as the precise definition of overlap 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. If this is the case, it will have severe consequences for learners, higher education, and employment. Whilst we support T Levels and will continue to work to ensure these are successfully implemented, the unintended consequences of the removal of large numbers of existing high-quality qualifications, to create low competition to support the delivery and take up of T Levels, could have a significant negative impact.

The definition of overlap and the removal of funding for qualifications is described as follows:

- ... *'we propose that level 3 technical qualifications for 16- to 19-year-olds must provide the student with at least occupational entry-level competence. This will form the basis of our assessment of overlap: if the qualification provides entry-level competence in an occupation where a T Level is available, it will be considered to overlap.'* ([Government response to Stage 1 of the Review](#))
- Entry level competence is described as where: *'the learner has achieved as many outcomes of the standard as can reasonably be expected through a predominantly classroom-based course, and can perform to a level needed to successfully start an entry-level role relevant to the occupation. The learner is well placed to reach full competence after a period of on-the-job experience.'* (Consultation, para 42, footnote)
- *We will send awarding organisations (AOs) the list of employer-led standards covered by wave 1 and 2 T Levels in each route and the qualifications we have identified as aligning with these standards, and therefore considered to overlap with a T Level. We will remove funding approval from these qualifications in 2023.'* (Consultation, para 54)

Given this broad definition of entry-level competence, and therefore the broad definition of overlap and the potential to define a vast number of broader vocational qualifications as 'overlapping' with T Levels, we are concerned about this approach to removing funding approval.

b) Yes.

Any definition of overlap should consider purpose, size, content, and assessment.

Several other factors should be considered when deciding whether a qualification overlaps with T Levels.

- The **purpose of the qualification in the sector space**. The purpose of a T Level is narrow and contains specialist content, based on employer-led standards, and prepares learners for a technical pathway.

'Technical' refers to an individual role within an occupation. Whilst some of the content of a BTEC qualification may cover part of a standard, they are broader qualifications. Their purpose is to develop the practical application of skills and knowledge, but also to allow learners to study a range of areas within an industry and give learners an understanding of the industry, and the roles within it and how they relate to one another, to develop an awareness of the industry, and the area they may wish to specialise in. They allow learners who do not wish to specialise at 16, to develop the understanding and confidence they need to make their choice at the right time. This gives learners the opportunity to choose the right path at age 18/19 when they have the maturity and a clearer focus on the career they are suited for and what opportunities exist in their region.

- The **size** of qualifications, and their necessity in the 16-19 system to allow learners to take qualifications that complement each other to broaden their options and support them to progress. T Levels are too big to be taken alongside other qualifications. The single focus of the T Level will not suit all learners and smaller qualifications need to be available for those who want to combine qualifications, with for example, a general (academic) qualification.
- The **assessment** of a qualification. Broad vocational qualifications support learners into employment by ensuring the assessment of a qualification reflects the needs of employers and this is increasingly also the case in higher education. These forms of assessment also suit learners who want a more vocational educational experience and perform better undertaking tasks that assess skills as well as knowledge and that relate to real or realistic working practice. The current BTEC qualifications approved by DfE have around 30-40% assessment by written examinations. The remaining 60-70% may include assignments, projects, practical tasks, and presentations and this facilitates the development of a broader range of skills and reflect the needs of the sector. The assessment also better reflects the schemes of assessment of undergraduate degree programmes, particularly those in the more applied subject areas.

#### A wider range of qualifications should continue to be funded alongside T Levels.

- Broader vocational options, as well as technical and occupational T Levels, should be available. These include the 1080 and 720 glh broader vocational BTECs. The 1080 glh qualifications are usually taken as a complete study programme. The 720 glh qualifications are often taken alongside an A level.
- A broad range of smaller qualifications also need to be made available that can complement A levels to broaden as well as deepen knowledge and skills. These include the 360 and 180 glh BTEC qualifications.
- These existing qualifications have all been redeveloped in line with new DfE criteria.
- Many of the larger qualifications are Tech Levels which are defined by the DfE as rigorous advanced (level 3) technical qualifications, on a par with A levels and recognised by employers. They are for post-16 learners wishing to specialise in a specific industry, occupation\* or technical role. They equip a learner with specialist knowledge and skills, enabling entry to an apprenticeship or other employment, or progression to a related higher education course. In some cases, these qualifications provide a 'licence to practise' or exemption from professional exams. Tech Levels are one of three components of the new Technical Baccalaureate (TechBacc) performance table measure.
- The term 'occupation' encompasses several related roles that are characterised by a set of common knowledge and skill requirements. 'Technical role' refers to an individual role within an occupation. (T Levels are designed to be Technical qualifications.) Qualifications should prepare a learner either for direct entry to a relevant workplace, including as an apprentice, or for higher study in the chosen specialist area. The underpinning knowledge and skills developed should also prepare the learner for progression within the broader occupational area.)
- Most of the smaller qualifications (and some of the larger, depending on the sector) are Applied General qualifications and are defined by the DfE as rigorous advanced (level 3) qualifications that allow 16 to 19-year-old learners to develop transferable knowledge and skills. They are for learners who want to continue their education through applied learning. Applied General qualifications allow entry to a range of higher education courses, either by meeting the entry requirements or being accepted alongside and adding value to other qualifications at level 3 such as A levels.

We give further details in our response to other questions in the consultation.

**Question 10: Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?**

No.

The qualifications will not be sufficient to provide the broad range of qualifications needed in a 16-19 system that works for all.

We disagree with the proposal that the qualifications described in paragraph 71 to 73 are the only qualifications that should remain available in the new landscape for 16-19-year-olds to be taken alongside A levels. We do agree that these two groups of qualifications would be useful in the 16-19 landscape, but they should be made available alongside a broader range of qualifications.

Our key concerns are that given the proposal to remove funding approval for qualifications that overlap with A levels, the remaining qualifications (alongside A levels) will not be sufficient to provide the broad range of high quality and useful qualifications needed in a 16-19 system that works for all.

- They will not offer learners the opportunity to take technical or vocational qualifications alongside general (academic) qualifications in order to follow a broad pathway.
- The narrowed and limited choice will have a significant impact on access and participation, progression, and wage returns and employment prospects for individuals, diversity and inclusion, higher level skills, on employer skills needs in a changing economy. Removing funding approval for all qualifications that overlap with A levels will result in a qualification system that cannot meet the needs of a constantly evolving jobs market in which automation and technological advances are accelerating. The resulting skills gaps will damage the economy.
- Whilst affecting all learners wanting to follow a technical or vocational route, it will particularly affect specific and protected groups.

We give further details in our response to other questions in the consultation.

**Q11: Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?**

Yes.

We welcome the acknowledgement in the consultation that these are valuable qualifications for learners, higher education, and the economy.

**Q12: Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?**

Yes.

The definition of overlap needs further detail and may be very broad. This will have severe consequences for learners, higher education, and the economy.

It is difficult to answer this question in full as the precise definition of overlap 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. Given the proposal to, with some limited exceptions, remove funding for qualifications that offer an applied or alternative form of study in an A level subject area, we are concerned that this could have severe consequences for learners, higher education, and employment. Removing large numbers of smaller vocational qualifications, where an A level exists with broadly similar content, and focussing on A levels as the only route to supporting progression to higher education, could have severe unintended consequences for learners, and have a significant negative impact.

The removal of qualification in the Technical route will also have a negative impact on the options for learners wanting to take an A level alongside a larger vocational qualification. As outlined in Question 9, under the current proposals the Technical route cannot be combined with other areas of study to broaden knowledge and skills.

Any definition of overlap should consider purpose, size, content, and assessment.

Several other factors should be considered when deciding whether a qualification overlaps with A levels.

- The **purpose of the qualification in the sector space**. The purpose of an A level is to develop subject knowledge and skills. Whilst some of the content of a BTEC qualification may cover part of an employer-led standard, they are broader qualifications. Their purpose is to develop the practical application of skills and knowledge, but also to allow learners to study a range of areas within an industry and give learners an understanding of the industry, and the roles within it and how they relate to one another, to develop an awareness of the industry, and the area they may wish to specialise in. They allow learners who do not wish to specialise at 16, to develop the understanding and confidence they need to make their choice at the right time. This gives learners the opportunity to choose the right path at age 18/19 when they have the maturity and a clearer focus on the career they are suited for and what opportunities exist in their region.
- The **assessment** of a qualification. Broad vocational qualifications support learners into employment by ensuring the assessment of a qualification reflects the needs of employers and this is increasingly also the case in higher education. These forms of assessment also suit learners who want a more vocational educational experience and perform better undertaking tasks that assess skills as well as knowledge and that relate to real or realistic working practice. The current BTEC qualifications approved by DfE have around 30-40% assessment by written examinations. The remaining 60-70% may include assignments, projects, practical tasks, and presentations and this facilitates the development of a broader range of skills and reflect the needs of the sector. The assessment also better reflects the schemes of assessment of undergraduate degree programmes, particularly those in the more applied subject areas. Most A Levels are assessed 100% by written exams; some have 70/80% written exams; while a small number have 50% or less assessed by written exams. The current BTEC qualifications approved by DfE, have 30-40% assessment by written examinations. The remaining 60-70% may include assignments, projects, practical tasks, and presentations and this facilitates the development of a broader range of skills and better reflect employer needs. The assessment also better reflects the schemes of assessment of undergraduate degree programmes, particularly those in the more applied subject areas.

A wider range of qualifications should continue to be funded alongside A levels.

- A broader range of smaller qualifications need to be made available that can complement A levels to broaden as well as deepen knowledge and skills. These include the 360 glh and 180 glh BTEC qualifications.
- These existing qualifications have all been redeveloped in line with new DfE criteria.
- Most of the smaller qualifications are Applied General qualifications and are defined by the DfE as rigorous advanced (level 3) qualifications that allow 16- to 19-year-old learners to develop transferable knowledge and skills. They are for learners who want to continue their education through applied learning. Applied General qualifications allow entry to a range of higher education courses, either by meeting the entry requirements or being accepted alongside and adding value to other qualifications at level 3 such as A levels.

We give further details in our response to other questions in the consultation.

**Q13: Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?**

No.

The qualifications will not be sufficient to provide the broad range of qualifications needed in a 16-19 system that works for all.

We disagree with the proposal that the qualifications described in paragraphs 79 to 80 are the only qualifications that should remain available in the new landscape for 16-19-year-olds as alternatives to A levels.

We give further details in our response to other questions in the consultation.

**Q14: Do you agree with our proposal the IB Diploma should continue to be funded?**

Yes.

We welcome the acknowledgement in the consultation that this is a valuable qualification for learners, higher education, and the economy, however, the proposals could limit the continuation of the IBO International Baccalaureate Career-related Programme (IBCP).

The IBO offers a qualification called the International Baccalaureate Career-related Programme (IBCP) which combines elements of the IB Diploma with a vocational qualification. This must be at least the size of one A Level but the two and three A Level sized BTEC Nationals are the most common ones taken. This has proved successful and the numbers taking it have been growing rapidly. These consultation proposals would limit the continuation of this successful programme.

**Q15: Do our proposals for academic qualifications for 16-to-19-year olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high-quality higher education?**

No.

We disagree that the proposals for academic qualifications for 16-to-19-year olds will provide opportunities to progress to a broad range of high-quality higher education. We have several concerns about the impact of the proposals on many learners looking to progress to higher education.

1) The proposal would have negative consequences for thousands of individuals progressing to university each year.

The Consultation states that:

- *'Recently reformed A levels – of which there are 555 individual A or AS levels covering a wide range of subject areas – are a well-established, popular, and world-class choice. They are central to progression to HE for most students. We believe A levels provide the best preparation for HE in most academic subject areas, and opportunities for progression to high value courses at the broadest range of HE providers.'* (DfE Consultation, para 68)
- *'With some limited exceptions, we propose to remove funding for qualifications that offer an applied or alternative form of study in an A level subject area. As a result, we expect that where a qualification*

*overlaps in its content and purpose with A levels, it will not meet our criteria for public funding.’ (DfE Consultation, para 69)*

We would be concerned about the removal of these qualifications which support thousands of individuals to progress to higher education each year.

- 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. This is a major driver behind increasing access to, and inclusion of, higher education. In 2017 63,000 learners entered higher education with a BTEC only, 41,000 learners entered with a BTEC and an A level, and 243,000 entered with A level only.
- BTEC Nationals are accepted by over 150 UK universities and higher education institutes for relevant degree programmes either on their own or in combination with A Levels – including many high tariff institutions – for example, around 6,500 learners with BTECs studied at the Russell Group in 2017.
- The proposals will reduce the number of BTEC qualifications that can be taken as part of a mixed curriculum offer, yet feedback from Higher Education Institutions indicate this blended offer reflects assessment practices at higher education.
- Whilst T Levels will attract UCAS points, it is not yet clear how many Higher Education Institutions will accept them. Individual institutions need to accept them, and many have yet to do so. Some are reticent to do so before they see the outcomes of the qualifications and are concerned by the positioning of the T Levels as being first and foremost, a qualification that will support progression into work. This is reflected by the fact that the consultation asks only about "academic" qualifications for entry to higher education.

It was also noted in the first stage of the Review that *‘Many students entering with Applied General qualifications are lower-achieving in comparison to students who gain a place at university through A Levels and are more likely to drop out. We want to understand the role of Applied General and other qualifications in supporting progression to successful outcomes and whether, in some cases, students would be better served by taking T Levels, a level 3 Apprenticeship or A Levels. In this section we ask what additional data might be available to explore this.’ (para 49)*

We responded to this concern in our response to the first stage of the Review. We shared research undertaken with Exeter University to better understand the results. Our findings concurred that drop-out rates are higher for BTEC at the end of year one of study, compared to A level learner, but the figures for the second and third year of degrees were even across A Level and BTEC. Amongst other factors, the research looked at cultural and social factors pertaining to both the institution and the learner that affect the university experience to better understand the reasons for non-completion. Most notably, given the different socio-economic backgrounds of BTEC learners, compared to A level entrants, reasons for learner dropout were often intricately linked to having weaker social networks and a greater likelihood of having a job or commuting to study. Universities are now doing more to recognise and support all learner in this transition year, which should improve retention and achievement overall and Pearson are working with universities to encourage them to support a more diverse learner intake.

We also highlighted that these findings were supported by the research report [Advance HE in 2012: Student Retention & Success](#) programme which highlights that *‘Higher education must accept that the implications of offering access to non-traditional students do not end, but rather begin, at the point of entry’*, and SMF research: [Building on Success](#) which looks in-depth at the differences in retention by ethnicity and socio-economic status.

[Further research](#) funded by the OfS in 2019 highlighted the need for HEIs to provide better experiences for BTEC learners to ensure parity with A level learners and notes that *‘it would be unwise to draw any simplistic causal assumptions based only on prior qualification. To better understand and address these differential outcomes, we might consider the research on students’ experiences at university, particularly research which identifies the experiences of students who are not from the predominant white, middle class, traditionally-qualified group.’ (para 3.5)*

In January 2021 HEPI published [A short guide to non-continuation in UK universities](#) which highlights that the UK has a positive record on learner retention relative to other places. *‘International comparisons suggest the UK has the highest completion rates for students on bachelor’s degrees among comparable developed countries. At 72%, it is significantly above the average of 39%.’* It concludes that concluded that *‘Concern about high drop-out rate is*

*unlikely to disappear. ... [M]ore support could usefully be delivered to those at particular risk of dropping out. But there is also much misunderstanding on the whole issue and rough-and-ready measures to address the problem may reflect confused policy intentions and risk being counter-productive.'*

2) The impact on progression to higher education would result in a negative impact on wage returns and employment prospects for young people.

In the consultation document it is stated that CVER analysis found that the wage differentials for those with A levels and a First Degree (Level 6) were higher those with a Level 3 BTEC and a First Degree: *'We believe A levels provide the best preparation for HE in most academic subjects areas, and opportunities for progression to high value courses at the broadest range of HE providers.'*(paragraph 68 – Page 28), and *'Recent analysis by CVER, found earnings benefits for those obtaining a first degree with A levels were generally higher than those for obtaining a first degree with BTECs, even after controlling for background characteristics'*.(footnote 20 – Page 28).

Whilst across most specifications, it is true to say that the wage differentials are slightly higher for men who have A levels/First Degree compared to A levels only, relative those who have Level 3 BTECs/First Degree relative to Level 3 BTECs only, it is not true for women (2019 CVER Report, [BTECs, higher education and labour market outcomes using the Longitudinal Education Outcome \(LEO\) dataset](#), Table 8).

Even more importantly, the earnings premium from BTEC Level 3 to a first Degree are positive and high even if lower than those with A levels/First Degree. The report highlights that *'When we use a common counterfactual group (i.e. those who either achieve BTECs or 2+ A levels or some combination as their highest qualification), we still find positive earnings differentials for those achieving a degree via the BTEC route (i.e. between 16% and 18%). The gap with the estimates for achievers via the A level route is large in the baseline regressions (in excess of 20 percentage points) but becomes smaller (around 5 percentage points) as we introduce further variables in the model. Overall, the analysis confirms that BTECs act as a stepping-stone for further study especially for learners studying specific BTEC 3 subject areas. Expected earnings and employment differentials for someone progressing from a level 3 BTECs to a first degree are positive, with significant variation (for earnings differentials) by degree subject area of study.'*

It is worth noting that the CVER studies refer to a cohort of 15-year-olds taking their GCSEs in Key Stage 4 some two decades ago, and 16–18-year-olds at least a decade ago. Today, the content and format of Level 3 BTECs is quite different, and the post-18 education and labour market context has changed and is changing.

3) The impact on progression to higher education seriously risk the reversal of current trends to widen diversity and broaden inclusion - future higher education learner cohorts could be far less diverse and inclusive.

The impact assessment states the following:

- *'Higher Education (HE) providers could find a reduction in the number of applicants to study, because of the landscape proposal above. As identified above, some students may find it more difficult to achieve level 3 in future, which in turn would reduce the number of students with grades suitable for applying to HE.'* (DfE Impact assessment, para 47)
- *However, we think this risk is relatively small and likely to have a small impact. HE providers set their own entry criteria, and as such would likely be able to adjust their entry requirements to account for the new attainment profile at level 3. The main route into HE for 16 to 19 year olds are A levels, which remain unchanged in the future landscape. As such, the landscape proposals are expected to have a relatively small impact on progression to HE. (DfE Impact Assessment, para 48)*

We disagree that this risk is 'relatively small. Certain learner groups progressing to higher education will be severely impacted by these proposals.

It was noted in the first stage of the Review that *'The number of students entering university using Applied General qualifications (or similar qualifications that pre-date the introduction of this category of qualifications in performance tables) has increased significantly in recent years, coinciding with the growth of entry to higher*

education overall. This is especially the case for students from poor some black and minority ethnic (BAME) backgrounds.’ (para 49)

HESA data about the higher education learner cohort profile of those who followed an A Level only route, and those who followed a BTEC route, shows that a greater proportion of those entering higher education who followed the BTEC route come from an ethnic minority background.

Learners starting degrees in 2017	Asian	Black
A level only	12%	5%
BTEC only	17%	14%
A level and BTEC	14%	8%

The data shows a similar picture when it comes to social class. A greater proportion of those entering higher education who followed the BTEC route come from the bottom four socio-economic groups.

Learners starting degrees in 2017	Top 4 socio-economic groups	Bottom 4 socio-economic groups
A level only	64%	17%
BTEC only	46%	32%
A level and BTEC	56%	28%

There is a serious risk that the proposals would reverse current 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.

The Baker Dearing Trust has shared research they have undertaken (which they are submitting to the DfE in full in response to this consultation) showing that 80% of learners from disadvantaged backgrounds who progressed to university, and 100% of those securing apprenticeships, mainly STEM-related, did so through technical programmes which are being phased out. As a consequence of the T Level being the sole replacement, about half of all learners from disadvantaged backgrounds at UTCs (University Technical Colleges) will no longer have appropriate level 3 courses to study. Overall, the proposed qualifications structure is likely to reduce progression from UTCs to higher technical study and higher or degree apprenticeships by as much as 40%.

As highlighted in the Ofqual response to the first stage of the Review, *‘the BTEC qualifications referred to are right for some students as they engage them and give them the opportunity to achieve a level 3 qualification. The continuing opportunity to progress for these students will be a crucial factor in considering which qualification routes should receive funding alongside T Levels.’* And *‘we know that many students study Applied Generals – sometimes in combination with A levels – to progress to higher education. If T Level study is not suited to a student, if they are not ready to specialise in an occupation, or they are unable to access the qualification for any other reason, then there is a risk that a barrier to progress may be created if their alternative choices are unduly restricted. This may particularly (but not only) affect disadvantaged student groups.’*

Ofqual have reiterated this point in their response to the second stage of the Review *‘It is also important to reflect on how the variety of level 3 qualifications is currently used by different groups of learners. A number of qualifications are anticipated to be defunded under the proposals; the Department’s consultation Impact Assessment estimates that the qualifications that may no longer be funded could account for around 62% of current non-A level 16 to 19-year-old enrolments at level 3 – and yet we know that the number of learners using qualifications other than A levels to access higher education is growing, in particular the use of a combination of academic with smaller vocational and technical qualifications.’*

It is worth pointing out that the 2019 figures referred to by Ofqual (145,000 learners progressing to higher education with A levels, 22,000 with BTECs only, and 18,000 who combined A levels with BTECs) are based on the numbers of 18-year-olds progressing to higher education as this is the age that most A level learners progress. The actual number of learners with BTEC only, or who combine A levels with BTECs, progressing to higher education, is

far higher given the tendency for BTEC learners to progress a year later, often after taking an extra year (for assorted reasons) to complete their 16-19 study.

4) The impact on progression to higher education would result in a negative impact on employment and the economy.

BTEC courses offer a good foundation for learners to study higher technical and vocation courses 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.

#### **Q16: What additional support might students need to achieve the new high quality offer at level 3?**

Information, advice and guidance is crucial for both young people and adults.

High quality and impartial information, advice and guidance is crucial to ensure learners choose the right options to meet their progression needs and ambitions. Careers support for young, and older people, still needs improving in England. The [2018 Pearson Report from the Commission on Sustainable Learning for Work, Life and a Changing Economy](#) found that:

- *'Currently, the quality and quantity of career guidance for young people in this country is uneven. Too often, young learners are required to make important decisions on qualifications and progression routes without the necessary career information. While parents/guardians can provide informed guidance in some cases, this is not guaranteed. More is needed in the way of school and college-based career guidance, not only to further the progression of individuals but also to guarantee the future skills requirements of the economy. Young people should be fully aware of the careers that different qualifications could open up to them. Furthermore, they should have had exposure to, and experience of, those careers before making their decisions.'* (page 25)
- *The Baker Clause, which mandates that all education providers raise awareness among learners about alternative education provision, goes some way to meeting this need. The implementation of this clause should be monitored closely to evaluate and benchmark how it is being implemented and adhered to in schools.* (page 25)
- *Looking to the future, the Commission would like to see improved career guidance for people of all ages across the country. Career education and guidance should begin earlier in schools, should be embedded throughout the curriculum in secondary schools and colleges, and should continue to be available throughout people's career journeys. As employees increasingly look to upskill or retrain, there is a need for provision that targets those at 19 and over. While career education and guidance should be improved in schools and colleges, it should not finish there. Instead, good quality career guidance should be available for all.* (page 28)

English and maths are key skills for employment and need to continue to be supported, however the GCSE may not be the right option for all.

We fully support current government policy around the importance of English and maths to learner progression and success and the current focus on English and maths should be continued. However, the GCSE may not always be the right options for some students. The [2018 Pearson Report from the Commission on Sustainable Learning for Work, Life and a Changing Economy](#) found that:

- *'It is important that young learners should continue to study English and maths post-16 if they have not yet achieved a level 2 qualification, but not necessarily through a GCSE. Functional skills, or other appropriate qualifications, may be more appropriate for some young learners where this meets the requirements of*

*their progression route. Indeed, most T Level programmes are likely to accept either GCSEs or Functional Skills in English and maths. and maths.’ (page 21)*

- *‘Evidence suggests that some students are resitting maths and English well into their 20s. Functional skills should be offered as an alternative. This would help young people to succeed and not feel like they like they’ve failed and that what we should be doing here – helping young people to succeed.’ (page 22)*

**Q17: What additional support might SEND students need to achieve the new high quality offer at level 3?**

It is not clear that the qualifications currently taken by students with SEND are not supporting them to progress, and therefore we question the rationale for proposals that further disadvantage these students.

The impact assessment highlights that learners with SEND are more likely to be affected by changes to the qualifications available in the future landscape and that this could lead to lower participation and achievement rates at level 3. 40,000 (25%) of SEN learners could see their current provision be removed.

According to March 2020 statistics, the following numbers of learners were known to [Local Authorities in England](#):

- 1,145,550 16- and 17-year-olds. 92.6% of which are recorded as participating in education or training.
- 45,690 have a SEND (EHCP or statement). 88.5% of which are recorded as participating in education or training.
- 74,320 have SEN support. 87.1% of which are recorded as participating in education or training.

We are concerned about the lack of information in the consultation about how the needs of learners with SEND at level 3 will be met in the future. It is not clear that the qualifications currently taken by learners with SEND are not supporting them to progress, and therefore we question the rationale for proposals that further disadvantage these learners.

**Q18: Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?**

See Question 17.

**Question 19: Do you agree with our proposal to fund the same academic options for adults as 16-to-19-year olds?**

No.

We do not agree that adults will be well-served by the range of qualifications available.

We agree in theory that that the same academic options should be available for adults as for 16-to 19-year olds. Given the proposals to limit the qualifications available however, we do not agree that adults will be well-served by the range of qualifications available. Please see Question 12 and Question 15.

**Question 20: Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16-to-19-year olds in exceptional circumstances)?**

Yes.

We welcome the acknowledgement in the consultation that these are valuable qualifications for learners, higher education, and the economy.

**Q21: Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?**

No.

The principles are helpful, and we welcome the principles of modular delivery and recognition of prior learning and experience, however, we would not agree that summative assessment is necessary for all qualifications. We would welcome bitesize options as quickly changing skills needs mean that adults will, more than ever, need access to shorter programmes of learning.

- **Modular delivery:** We fully support the principal of modular delivery for adults. We know that the pace at which the economy is moving means that adults will have to stay engaged in learning and training throughout their lives, and access to modular courses should help this.
- **Recognising prior learning and experience:** We would also support a robust system which recognises prior learning and experience. We know that this can have its challenges and look forward to seeing the detail of how this could be supported.
- **Summative assessment:** We do not agree that summative assessment is necessary for all qualifications in an adult system. We understand that the *'tick box style system, where the student is recorded as slowly 'achieving competence' over a long period, but in fact is not competent to do the job after attaining all the 'parts''* could be an issue but that would be better addressed by ensuring qualifications that confer competency are taken over a certain time period rather than insistence on summative assessment for every qualification regardless of whether or not it is the most appropriate assessment methodology for the qualification.

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.

For example, in the Engineering sector, research carried out by the Automotive Industrial Partnership alongside the Aerospace Growth partnership and the Defence Growth Partnership, identifies a future training need for adults in the sector who will require upskilling as a result of technological change and progression. The research shows the need for small modules of training, including online, rather than full sized qualifications. The training requirements identified include areas such as automation, machine learning/AI, Smart Factories, Data Analytics/Big Data, Sustainability and Renewable Energy/Environmental Engineering and specialist subjects such as Battery technology as we move towards Net Carbon Zero.

This is supported by our own research which shows that individuals are recognising that the jobs market is moving so quickly that an industry that they know well may change fundamentally or disappear. Our 2019 [Global Learner Survey](#), which engaged with 10,000 people globally, shows that individuals around the globe are moving to 'DIY learning', recognising that they want to be in control of their own learning, in bite size chunks, often via technology. Individuals and employers are leading the reskilling/ upskilling efforts and in North America and Europe, the use of short courses offered by employers is proportionally high; in other markets, a greater proportion of people rely on being self-taught or enrolling in certification programs; and across multiple different countries, three quarters or more agreed that education does not stop at school. People need to keep learning or re-training throughout their career to stay up to date.

**Question 22: Do you agree with our proposed approach to making T Levels available to adults?**

Yes.

T Levels will be useful for adults who are at the same stage as 16–19-year-olds and who want to take a full-time occupationally-focussed programme, but if the technical qualification (TQ) specification is offered in modules, we would need to work with government to assure the integrity of the T Level brand.

We agree that these could be useful for many adults who are at the same stage as 16–19-year-olds and want to take a full-time occupationally-focussed programme. If, however, as the proposals suggest, the technical qualification (TQ) specification is offered in modules, and providers take the lead in developing learning modules, we would need further information and discussion to be assured they do not risk the T Level brand.

**Question 23: Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?**

Yes.

T Level occupational specialisms will be useful for adults, but we would need to work with government to assure the integrity of the T Level brand.

We agree these could be useful qualifications we would need further information and discussion to ensure they do not risk the integrity of the T Level brand.

**Question 24: Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?**

Yes

We welcome the recognition in the consultation that adults will need a far broader range of qualifications. However, 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 public funding for qualifications for adults that overlap with T Levels in 2023, and to instead review qualifications which overlap with T Levels are and approve them for teaching from 2024.

We agree with the proposals to support the many adults who will be studying qualifications in order to upskill or reskill, and therefore only require a technical qualification to focus on achieving competence to do a particular occupation, rather than more general preparation for entering skilled employment / their career as is done in a T Level. We also welcome the flexibility in approving qualifications that are aligned to occupations outside the current scope of the occupational maps but are in demand by employers, and qualifications focused on some cross-sectoral skills where they lead to skilled employment.

It is not clear in the consultation if smaller qualifications will be available for adults and would stress that quickly changing skills needs mean that adults will, more than ever, need access to shorter programmes of learning. We say more about this in Question 21.

As highlighted in our response to Question 19, 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, as

highlighted in our response to Question 21, we do not agree that summative assessment is necessary for all qualifications in an adult system.

**Question 25: What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116)?**

As sectors change and develop this will be an ever-changing landscape and working closely and flexibly with employers will be the best way to identify these. Current examples include digital automation, emerging technology and transferable skills which support employees of the future to keep up to date and grow as the industrial landscape changes around them.

**Q26: Do you agree with our proposed approach to reforming technical qualifications?**

No.

We have several concerns with the proposed approach to reforming technical (and academic) qualifications.

**1) The binary choice between ‘technical’ and ‘academic’ routes is problematic and undermines the value of vocational education – 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 consultation proposes that qualifications that are not ‘technical’ sit under the academic route. However, many of the qualifications that are proposed go under this route are clearly not ‘academic’ in the usually understood definition of the word. For example, in the consultation performing arts or sport qualifications with a strong practical focus sit in the academic route as alternative to A levels, where they offer breadth and depth valued by higher education for study in an allied subject. The proposal illustrates the problem with splitting the 16 to 19 landscape into a binary choice between ‘technical’ and ‘academic’.

We are also concerned that this approach is based on a view that looks to distinguish level 3 qualifications on whether they are primarily designed to *‘lead to skilled employment (‘technical qualifications’)’* or *‘designed to lead to higher education (HE) (‘academic qualifications’)’* (consultation para 34). It is problematic to define level 3 qualifications by their primary progression route. The split confuses the difference between the type of learning offered and the primary progression purpose of the qualification. It also suggests that all learning with a primary purpose of leading to higher education is academic, which is clearly not the case. It also defines higher education as an end destination rather than the reality, which is that higher education is a stepping-stone into a career. Furthermore, it undervalues vocational education and the higher education and higher technical education it can lead to and continues a worrying trend of undervaluing the skills of the people who take them. All good qualifications at level 3, whether occupational, broadly vocational, or general, should prepare learners for higher level study if they choose to follow that route and this view is reinforced by the promotion of the T Levels as qualifications that can help learners into skilled employment, higher level study, or apprenticeships.

Undervaluing technical and broader vocational knowledge and skills in this way will undermine the development of skills and higher-level skills in the UK. Research shows that the kinds of jobs that are predicted to grow are hi-tech and hi-touch. [RSA analysis of Labour Force Survey data](#) shows that between 2011-19 programmers and software developers were the fastest growing occupations, with over 160,000 new roles created (a 72% increase from 2011). They also highlight that we have seen a growth in hi-touch jobs. *‘Primary and nursery schoolteachers, care workers and home carers, nurses and nursing assistants were also in the top 20 fastest growing occupations. The growth in these roles is in keeping with changing demographics, particularly an ageing, ailing population – a trend that is almost certain to continue into the next decade.’* Many learners following the ‘technical’ route will

want to step off into the job market at level 3. Many more will want and need to progress to higher level study, to fill the jobs in demand at higher levels.

## 2) The proposals will both narrow and limit choice in the curriculum

### a) Narrowing choice in the curriculum

Under the current proposals the options available within the **Technical route** will be too narrow to support the diverse needs of all learners.

Whilst we fully support T Levels (and as an awarding body are offering T Levels) and believe these will offer a valuable route for 16-19-year-olds, they will not support all learners wanting to follow a vocational route. The proposal that T Levels, or Alternatives to T Levels that map to employer standards, should be the only route available to those wanting to take a sector-based qualification means all learners must follow a very specialised occupational pathway.

The Additional Specialist qualifications are proposed to complement the T Level and deepen rather than broaden a learner's knowledge and skills. The few learners who are able to take an additional qualification alongside their choice from the Technical route, will only have access to a qualification that will deepen rather than broaden a learner's programme.

Narrowing choice will see all learners wanting to follow a technical route pushed into making specific choices at the same age, whether they are ready or not. This is at a time when the English 16 to 19 curriculum is already seen as an outlier for the narrow breadth of its curriculum both for academic and technical pathways. The 2020 EPI report [An international comparison of technical education funding systems](#) finds that '*the breadth of curriculum of other countries, defined as the inclusion of general subjects beyond the scope of the core qualification, is largely missing*'.

The proposal to, with some limited exceptions, remove funding for qualifications that offer an applied or alternative form of study in an A level subject area will also lead to a narrow, and limited, curriculum in the **Academic route**.

Under the current proposals the options available within the Academic route mean that very few options will be available for learners wanting to take anything alongside academic qualifications.

Whilst the proposals will allow for a limited number of qualifications that offer an applied or alternative form of study in an A level subject area, the proposals give examples of Science and Business. These applied alternatives allow learners to develop the applied knowledge and skills they need to enter the workplace, and often led to learners applying to more vocationally oriented higher education courses.

### b) Limiting choice in the curriculum

Under the current proposals the technical route cannot be combined with other areas of study to broaden knowledge and skills. There is no indication that learners can take qualifications in the **Technical route** alongside qualifications in the **Academic route** to broaden their studies. Learners should be able to choose to combine a smaller qualification in the Technical route with a qualification in the Academic route.

The T Level is too big to combine with other studies. The consultation proposes that learners on the Technical route can take an Additional Specialist qualification alongside a T Level, or the alternative to the T Level. Given how big T Levels are it is likely that only the most able learners would be able to take advantage of the Additional Specialist qualification, or qualifications in the academic route (if this combination is allowed). For comparison, 3 A levels are 1,080 glh. T Levels are of various sizes, but examples are Construction: Design, Survey and Planning at 1,100 glh, and Digital: Digital Production, Design and Development at 1,200. In addition to glh, the significant industry placement element of T Levels is much larger than that required within other level 3 qualifications (with the exception of Childcare qualifications). Learners will no longer have the choice of taking a broad vocational qualification at level 3 that allow them to defer specialisation and explore their options within a sector or take alongside another qualification to broaden their options.

### 3) The geographical limitations of the T Level will limit choice in the curriculum

The 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.

### 4) T Levels should be used to support more 16–19-year-olds to follow the apprenticeship route

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 (as outlined in this response), and would potentially be more effective at level 2. This would strengthen the pipeline of learners moving to higher level apprenticeships whilst also ensuring existing high value vocational qualifications offer learners broader choice and progression.

We give further details in our response to other questions in the consultation.

### Q27: Is there anything else we should consider when implementing our proposed approach?

Yes.

Several issues should be considered when implementing the proposals. These include the number of qualification available and the disruption of a system where existing high-quality qualifications currently work for many, and the impact, the timing of the reforms, the value of vocational qualifications as an export, and the need for careful transition.

#### 1) 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.

#### Level 3, full time, graded, classroom-based qualifications on Performance Tables and/or the UCAS Tariff

The DfE [Impact Assessment](#) (Table 10) spells out the qualifications impacted by the proposals. However, it leaves 1,670 qualifications, and the 207,100 learners they support, unaccounted for.

	Level 3 qualifications expected to remain (excluding A levels)	Level 3 qualifications expected to no longer be available	Total	All level 3 qualifications (excluding A levels)	(Unaccounted for)	All level 3 qualifications (including A levels)
Number of qualifications	690	1,410	2,100	3,770	1,670	4,060
16 to 19 Enrolments	249,100	400,400	649,500	856,600	207,100	2,738,800

It is unclear which qualifications fall into the ‘Level 3 qualifications expected to remain (excluding A levels)’ column, and the ‘Level 3 qualifications expected to no longer be available’ column. We have therefore conducted our own analysis of all qualifications at level 3, regulated by Ofqual and available for learner registrations on 15th

January 2021, to understand the impact of the Level 3 consultation on the key current vocational qualifications for 16 to 19-year-olds (those qualifications approved by DfE for inclusion on Performance Tables and/or on the UCAS Tariff).

**A total of 4,515** qualifications at level 3 are taken. **705 of these are not in scope** (i.e. are academic qualifications including GCE A and AS Levels (540 in total), and graded exams (165 in total), and were removed from this total.

**The remaining 3,810 in scope**, were assigned to specific groups:

- **558** are full time, graded, classroom-based qualifications. There were **346,775 learner completions** on these qualifications (and their predecessors) in 2019/20 (as per [Ofqual's dataset](#)).
- **This is comparable with the number of available academic qualifications of which there are 540.**
- **1,619** qualifications are smaller than a GCE AS Level (i.e. those of a size between 1 and 149 guided learning hours). These are often focused on a specific area of expertise, and can often be studied in a single day, week, or term, and are not comparable to a one- or two-year programme of study designed to enable adult learners to progress to HE or employment. For example, more than one third of the 482,310 total completions cross all qualifications in this group are on just four First Aid qualifications, that can be studied in either 6 or 18 hours.
- **1,633** qualifications with **152,545 learner completions** in 2019/20 are Apprenticeship or adult qualifications (i.e. NVQs and qualifications that confer occupational competence or the knowledge requirements of Apprenticeships). We have identified these by looking at qualifications that were funded as part of SASE Apprenticeship frameworks, are funded for 19+ learners but not 16-18-year olds or used primarily by adult learners in training providers and employers.

Type of qualification	Count of qualifications	Learner completions*
<b>Potentially in scope</b>		
Full time, graded, classroom-based qualifications on Performance Tables and/or UCAS Tariff	558	346,775
Small qualifications (less than 150 glh)	1,619	482,310**
Apprenticeship components and qualifications for adults	1,633	152,545
<b>Subtotal</b>	<b>3,810</b>	<b>981,630</b>
<b>Full time, graded, classroom-based qualifications - % of total in scope</b>	<b>14.6%</b>	<b>35.3%</b>
<b>Out of scope</b>		
<i>Academic qualifications (A &amp; AS levels, and other general qualifications) – out of scope</i>	540	846,746
<i>Graded exams – out of scope</i>	165	19,015
<b>Subtotal</b>	<b>705</b>	<b>865,761</b>
<b>Grand Total</b>	<b>4,515</b>	<b>1,058,610</b>

\* Total completions adjusted to include those on expired, predecessor qualifications which were replaced by awarding organisations in line with the government's reform programme.

\*\* More than one third of these completions are on four First Aid quals.

When it comes to STEM qualifications, the numbers are far fewer.

Level 3, full time, graded, classroom-based STEM qualifications on Performance Tables and/or the UCAS Tariff

Type of qualification	Count of qualifications	Learner completions*
<b>Potentially in scope</b>		
Full time, graded, classroom-based qualifications on Performance Tables and/or the UCAS tariff	135	77,885
Small qualifications (less than 150 glh)	220	60,370
Apprenticeship components and qualifications for adults	476	40,490
<b>Subtotal</b>	<b>831</b>	<b>178,745</b>
<b>Full time, graded, classroom-based STEM qualifications - % of total in scope</b>	<b>16.2%</b>	<b>43.6%</b>

<b>Out of scope</b>		
<i>Academic quals - not in scope</i>	137	313,599**
<b>Grand Total</b>	<b>968</b>	<b>492,344</b>

\* Total completions adjusted to include those on expired, predecessor qualifications which were replaced by awarding organisations in line with the government's reform programme.

\*\* 43% of the total completions on academic qualifications are on Maths qualifications

The 135 full time, graded, classroom-based qualifications on Performance Tables and/or the UCAS Tariff is made up of:

- 21 Science qualifications
- 56 Engineering qualifications (covering multiple disciplines)
- 29 IT qualifications
- 29 Construction qualifications

The 137 academic qualifications that are not in scope is made up of:

- 77 Science qualifications
- 42 Maths qualifications
- 16 IT qualifications
- 2 Engineering qualifications

Given that the key vocational qualifications referred to are career or industry related, and as part of the DfE and government reform, required support from industry and Higher Education Institutions who are delivering degrees leading to professional employment, the current offer is meeting sector demand. This was validated by the level of engagement on the development of these qualifications by industry and higher education, and by the large scale adoption by providers and the equivalent increase in learner uptake to beyond 300,000 in the 2020/21 academic year; a significant proportion of the 16-18 learner cohort.

The UK has more than 31 million employees working across diverse roles and industries. Over the last 30 years, we have seen significant professionalisation of the workforce (evidenced by the number of employees holding qualifications at level 6 and above), and an increase in the number of employees that hold qualifications at level 4 and level 5.

Government economic strategy (including the greening of the economy), and the 4th industrial revolution including a large element of on-shoring and more localised supply chains in pharmaceutical, technological and other areas, will require more rather than fewer less skilled employees with qualifications at level 4 and above. In STEM sectors for example, automation and emerging technologies are decreasing the need for level 2 roles and increasing the demand for level 3 and above roles.

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. T Levels and the 45 specified roles that they cover by design will not be sufficient to prepare us for the multiple roles that our changing economy will need. These qualifications play an important part in the supply chains of all qualified employees, including STEM employees as all those educated up to levels 4, 5 and 6 require a level 3 education as their base.

## 2) 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 of provision. Given the evidence presented in our response – about access and participation, progression, and wage returns and employment prospects for individuals, diversity and inclusion, higher level skills, and employer skills needs in a changing economy – it is not clear that many high-quality options are not supporting learners to progress, and therefore we question the rationale for proposals that disadvantages, or in many cases, further disadvantages these learners. 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.

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. 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.

As the Review document notes, significant recent changes have been made to qualifications in recent years. These new 'reformed' qualifications which meet the new performance table criteria have been running for less time and we have less evidence of their impact. It is critical that research referred to by government in order to make decisions is based on the latest qualifications. We are concerned that some of the evidence cited in the Review is based on data from 2008. It is therefore based on learners with unreformed BTEC qualifications and their performance in higher education. Care should be taken to ensure that decisions reflect recent changes to qualifications and are based on up to date information.

### 3) The impact of their removal and the negative impact of narrowing and limiting of choice

#### Access and participation, progression, and wage returns, employment and active labour market benefits

We are extremely concerned that the Impact Assessment makes an (uncertain) estimate 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.

The Impact Assessment also calculates that 400,400 learners, out of a total 2,738,800 16–19-year-olds, take qualifications 'expected no longer to be available' which accounts for around 15% of 16-19-year-olds. This is a considerable risk to access and participation.

In addition, many learners will struggle to obtain the English and maths requirement for T Levels 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. Research undertaken by the EPI in 2020 - [Analysis: Number of students required to continue English and maths study set to increase with rising unemployment](#) – tells us that 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.

The Impact Assessment also highlights the risk that these individuals may be worse off in terms of labour market outcomes and progression. *'Evidence shows that higher levels of qualifications are associated with higher earnings and employment prospects.'* *'Furthermore', it highlights, 'those students may also find themselves no longer able to progress onto HE and accrue the significant average benefits to wage and employment returns.'*

Research carried out by [FFT Education Datalab](#) in 2018 compared wage returns for young people who had previously taken BTEC and A level courses (regardless of whether they progress to HE). The analysis concluded 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. The data shows BTEC learners earn more on average at this age regardless of their route to work. This may be due to the enhanced employability skills of BTEC learners, or their choice of more vocational degrees. Removing a route to work, or a route to work via university for BTEC learners will depress the earning differential for this group.

The 2017 CVER Report [The earnings differentials associated with vocational education and training using the Longitudinal Education Outcomes data](#) shows the earnings of young adults with a Level 3 BTEC as their highest qualification, and the earnings benefits of achieving at level 3. It also shows the benefits in relation to the proportion of the year spent in employment, and the proportion of the year on active labour market benefits. Level BTEC qualifications support those who take them, woman in particular, to stay in employment and stay off active labour market benefits. The removal of these qualifications poses a significant risk to these individual's life chances.

	Male	Female
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	Proportion of the year in employment	Proportion of the year on active labour market benefits	Proportion of the year in employment	Proportion of the year on active labour market benefits
<b>BTEC Level 3</b>	72%	6%	72%	9%
<b>2 GCE A levels or equivalent</b>	73%	4%	73%	6%
<b>5 GCSEs A* - C</b>	67%	6%	66%	11%

### Diversity and inclusion

The Impact Assessment also highlights that 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 the qualifications available in the future.

44,000 learners from Asian and black ethnic minority groups could be affected. The proportion of learners currently enrolled on these qualifications is twice as high in the most disadvantaged quintile (20%) than in the least disadvantaged quintile (10%). The impact on SEND learners is covered in Question 17.

### Higher level skills

In Question 15 we explain the negative consequences for thousands of individuals progressing to university each year, the negative impact on wage returns and employment prospects for individuals, the serious risk of the reversal of current trends to widen diversity and broaden inclusion leading to future higher education learner cohorts that are far less diverse and inclusive, the negative impact on employment and the economy.

### Employment and the UK economy

The current system of qualifications supports a low level of labour market imbalance in the UK – the [2018 OECD Skills for Jobs Report](#) shows the low level of labour market imbalance in the UK relative to other OECD countries. The report shows that occupational imbalances had increased in recent years in many countries and part of this result was probably linked to the different ability of some countries to cope with the challenges brought by the global economy crisis. Some degree of skill mismatch is inevitable as rapid technological change requires constant skill development that can be achieved only with some lag. However, persistent mismatches may be the symptom of labour markets functioning sub-optimally. Those countries with a high imbalance are where employers struggle more to find workers with adequate talent (shortages) and many workers face low demand in their national labour market (surpluses). The fact that the UK ranked as the 8<sup>th</sup> lowest, of 34 countries, is 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 qualifications to employer-led standards will not allow for the flexibility and agility needed to meet newly emerging demand. For example, the 2017 Industrial Strategy published in 2017 highlighted that *'Artificial intelligence and machine learning are general purpose technologies already starting to transform the global economy. They can be seen as new industries, but they are also transforming business models across many sectors', that 'Whole new industries will be created and existing industries transformed as we move towards a low carbon, more resource-efficient economy', and that 'New technologies, new ways of doing business and new industries often require an agile but dependable regulatory system to support them.'*

We also require agile way of developing the skills that will support them for both young people and adults.

Pearson offer T Levels and believe they will support those learners who take them to succeed in higher level study and in employment. However, they are designed to meet the criteria of specific job roles and cannot therefore alone meet the needs of a constantly evolving jobs market in which automation and technological advances are accelerating. Given the workplace requirement there will also be geographic limitations on their availability.

Occupational maps, and occupations, take time to develop and defining them may mean qualifications cannot be developed at the pace required to meet employer needs.

The resulting skills gaps will damage the economy.

This issue may be captured for adult skills in the consultation proposal to fund 'qualifications [for adults] that are aligned to occupations outside the current scope of the occupational maps but are in demand by employers' but we would need to see the detail to be confident of this.

#### **4) Disruption during 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. Different industries will be impacted by COVID-19 and Brexit, and some will be impacted by both. In addition, both the economic impacts of the coronavirus and the impact of Brexit are likely to increase regional disparities. 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.

#### **5) The reputation and recognition of vocational qualifications as a valued global export**

BTEC are an important and highly regarded export. BTEC is taught and recognised in more than 80 countries around the globe. Thailand is a good example of this. In 2018 Pearson received official endorsement from the Thai Government which allows BTEC qualifications to be delivered in every vocational and higher institution in Thailand, both in the public and private sector. His Excellency, Thai Ambassador to the UK, Mr Pisanu Suvanajata, reflected on importance of BTECs for Thailand at the recent BTEC Awards Ceremony. (minutes 38.57-41.30). The importance of BTECs in Thailand feature in the 2019 UK International Education Strategy, published by DIT and DfE. (page 19)

Pearson is a founding member of the UK Skills Partnership, a collective body that actively and strategically promotes the UK's technical vocational and training expertise globally. Its launch was announced by Secretary of State for International Trade, Liam Fox, in October 2017. Pearson is also a main partner of the Wilton Park Dialogue Programme, supported by DIT and the FCO (Foreign and Commonwealth Office).

The BTEC Awards 2020 reflected the importance of BTECs globally. 2020 marked the 10th Anniversary of the BTEC Awards to celebrate vocational excellence. In 2020 there were 469 nominations across all categories, with 206 nominations in the UK and 263 international nominations from over 25 countries. Most of the international nominations were from: Turkey, Myanmar, Malaysia, UAE, India, Singapore, Slovenia, Spain, and Northern Ireland. During the Awards, the Minister for Exports, Graham Stuart MP, recognised the value of BTECs as a UK export and as a world class qualification (minutes 26.11-29.28).

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, and the Secretary of State for *Education*, Gavin Williamson MP, recognised the role BTEC plays to improve careers-focused education internationally, alongside being an excellent example of promoting wider UK excellence in Thailand and the region.

#### **6) 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.

#### **7) Managing the transition**

Transition to any new offer needs to be managed carefully. There is a clear risk of disruption unless change is phased carefully. Even at this stage, the uncertainty around future provision is causing schools, colleges, higher education institutions, employers, and parents and learners, to ask questions. The disruption in the system for qualifications – even those unaffected – 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.

**Q28: Do you agree with the proposed approach to qualifications in apprenticeship standards?**

No.

We agree in the main with the approach but cannot see in the process outlined above, that the voice of the employer group is in deciding if qualifications are needed within Apprenticeships. The voice of the employer is crucial in this process. In addition, it is not clear how the approach will be managed alongside the apprenticeship standard review cycle.

**Q29: Do you agree with our proposed approach to reforming academic qualifications?**

No.

See Question 26.

**Q30: Is there anything else we should consider when implementing our proposed approach?**

Yes.

See Question 27.

**Q31: What support is needed to smooth the implementation of the proposed reforms?**

See Question 27.