

## CONSULTATION RESPONSE

# Review of post-16 qualifications at level 3 in England: Second Stage

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## Introduction

1. The proposals to reduce and/or remove funding from most qualifications at level 3, aside from A levels and T Levels, needs extremely careful consideration in light of its potentially damaging impact on choice and progression, especially for students from disadvantaged backgrounds and adult learners. While it might sound wise to reduce the number of available qualifications to enable clearer choice for learners, there is a significant risk that this will result in a shift to a stark binary divide for students at level 3 (most at aged 16) between academic qualifications and those technical qualifications that are very narrowly focused on a particular vocational area.
2. There is certainly a value in some rationalisation of the large number of qualifications at level 3, as a proliferation of too many programmes can cause a “choice paralysis” for students. It is also important to ensure that all qualifications offered, at whatever level, are credible and carry reputational value with stakeholders. However, the introduction of essentially a basic choice between T Levels and A levels will narrow the curriculum for young people and adult learners at a time when what is required for the world of work changes rapidly, with career success founded as much on individuals possessing particular personal qualities and transferable skills (resilience, independence, problem-solving) than specific technical competences.

## THE STRENGTHS AND SHORTCOMINGS OF THE CURRENT SYSTEM FOR LEVEL 3 QUALIFICATIONS

3. The current approach to level 3 qualifications, while perhaps unwieldy in terms of the overall number of qualifications, has strengths in allowing students to blend access to both A levels and applied generals – usually BTECs – in a way that supports a greater range of post-18 options. This blend can facilitate student progression into different types of employment or to higher education which might otherwise be closed to them, rather than abruptly ending any semblance of general education for the learner at age 16. The combined academic and vocational experience of applied generals (or a mix of applied generals and A levels) has been of value for students from under-represented and disadvantaged backgrounds, as it opens up further study and makes higher education a real possibility. It is unclear at this stage that all T Levels will possess the same progressions pathways to the same extent, though we hope that T Levels over time will positively facilitate learner progression to diverse destinations.

4. Modern universities have seen that BTECs have acted as a bridge for a large number of under-represented students, who have undertaken these qualifications and then been able to proceed to a wide range of careers, as their currency has been relatively widespread. A key question, as alluded above, is around the currency that T Levels will hold and any possible narrowing of diverse progression opportunities. Past experience shows that it can be very challenging for a new qualification (foundation degrees, or the 'applied A levels' launched in 2005) to replace existing ones.
5. The difficulty with T Levels is that it is as yet unclear if a student will be able to study for T Levels and then decide on a career or subject change later on, or if a 16 year old will have to pursue in adulthood a path they embarked on as a child or young person. Furthermore, there needs to be more detail on whether more universities would allow entry with T Levels than currently do with BTECs. Modern universities particularly have been instrumental in providing options for higher education to students with qualifications that are not A levels, and this is likely to continue, but it is challenging to understand the currency and relevance of a new qualification. If T Levels only lead to apprenticeship routes, then this may well damage opportunities and social mobility, especially in times of economic downturns when employers restrict apprentice recruitment.
6. The nature of the proposals envisages a future level 3 environment whereby students who are A level capable (or willing) have a wide range of choices open to them, with only marginal restrictions on what further options are available to them once they acquire those qualifications. They may choose to enter into work, enrol in higher education, or combine both in a degree apprenticeship. Their choices will be somewhat narrowed based on their choice of A levels, but many options will remain open, especially if they pursued a mix of science and arts subjects. By contrast, a student who is not A level capable (or willing) will be funnelled into a specific, restrictive pathway that leads them towards one particular employment destination.
7. The learner's progression route beyond age 16 in this instance would essentially be defined for them by the government on account of the T Level / higher technical qualifications reforms established. This risks capping aspiration and choice for people who develop and progress educationally at a later stage. Of course, a choice at age 16 will be influenced by early educational experiences, which could mean that someone is funnelled towards the T Level route at age 14; something that would not necessarily happen if the student showed a clear capability for A level academic study. This potentially damages work on widening access and increasing participation in higher education.

## IMPLICATIONS FOR ADULT LEARNERS

8. These issues are just as, if not more, acute for adult learners. Although the consultation confirms that T Levels will be available to adults, the programme requirements in terms of Guided Learning Hours involved will make them inaccessible to the vast majority, who will likely need to combine study with work and other commitments. The length and complexity of the T Level programme could be a massive barrier for older prospective learners. Applied General qualifications are much more accessible, and so much more capable of providing an adult learner with the experiences and qualifications they require to improve their educational, employment and life chances.

## Conclusion

9. The Department for Education should seek to rationalise the wide range of level 3 qualifications on offer to post-16 learners but eschew eliminating the accessibility of a broad range of applied general qualifications for study at this level. Applied generals, or a combination of these applied general qualifications with general qualifications at level 3, should continue to be a viable option for learners entering Key Stage 5 or later in life as adult learners. Once the full suite of T Levels have bedded down - and hopefully demonstrated diverse progression routes for their learners in the mid-2020s - the government could conduct a further review of level 3 qualifications at that point to determine any requirement for a further rationalisation of qualifications. To take the step of eliminating applied generals *at this stage* would be precipitous and highly risky for the prospects of future learners.