

Response by the Greater London Authority on behalf of the Mayor of London to the consultation by the Department for Education on:

Review of post-16 qualifications at level 3 and below in England

Overview

The Mayor published his Skills for Londoners Strategy in June 2018, setting out his vision for a ‘City for all Londoners, ensuring all Londoners and businesses get the skills they need to succeed in a fair, inclusive society and thriving economy’. The strategy’s priorities and actions were developed with advice from London representatives from business, the provider base and communities. It included the Mayor’s ambitions to ensure that the £311m per annum Adult Education Budget (AEB) better meets the needs of Londoners providing them with the skills they need to progress and succeed. The Secretary of State has delegated the provision of adult education in the capital to the Mayor of London from August 2019. In light of the Mayor’s new powers and responsibility for the AEB in London, it is important that City Hall is fully engaged in consideration of the purpose of adult qualifications and the expected outcomes.

Summary of response

City Hall welcomes the opportunity to submit its views on the proposed reform of post-16 qualifications at level 3 and below in England. The key points made in response to the consultation are summarised below:

- Government must ensure that schools and further education colleges fulfil their statutory obligations to provide effective careers education, information, advice and guidance advice (CEIAG) to learners at all key stages of the learner’s journey;
- Greater London Authority, mayoral combined authorities and Skills Advisory Panels should have the influence and ability to determine the qualifications needed in their localities to meet economic need;
- personal, social and employability skills are necessary for learners and must be continued to be offered as part of a package of vocational qualifications;
- progression to higher study and employment would provide evidence of successful outcomes and should be measured and reported by skills providers;
- vocational qualifications for adults at level 3 and below need to address the priorities and needs of a region across its industries;
- the introduction of T Levels for young people aged 16-19 should not result in narrowing the offer available to adults to meet specific business and individual needs;
- special attention should be given to niche or specialist delivery to ensure that vocational pathways particularly at level 2 and below are not lost and continue to be made available;
- Government should consider the overall impact of study options available at post-16 as well as a review of qualifications; and
- any nationally proposed policy changes to funding that will impact the local offer through AEB devolution in London, must be agreed with the GLA in advance.

Question 1

How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer? Please give reasons for your answer, including any examples of how this may be achieved.

In order to extend the clarity of purpose of all qualifications at Level 3, Government must ensure that schools and further education colleges meet their statutory obligations to provide effective careers education, information, advice and guidance (CEIAG) to learners. Good CEIAG should be available at all key stages of the learner's journey when decisions will be made that may affect future destinations for the learner.

The purpose of the review of qualifications needs to be communicated effectively to providers and learners and demonstrate how it will build upon previous reviews of qualifications undertaken by Government, such as the Regulated Qualifications Framework (RQF) replacing the Qualifications and Credit Framework (QCF). It is important that learners and parents understand the benefits and the impact of any further changes.

Government should engage more collaboratively with the Greater London Authority (GLA) and other mayoral combined authorities on the outcome of the review. In London, the Mayor's Skills for Londoners (SfL) Board has been constituted to provide oversight and steer to the Mayor skills and employment programmes and policies. It also serves as London's Skills Advisory Panel. The SfL Board and skills advisory panels across the country should be engaged to help shape further consultation activity locally to ensure that the purpose of adult qualifications and the expected outcomes these may have are relevant for learners, businesses and the wider economy in localities.

Question 2

Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.

Personal, social and employability skills are indeed necessary for learners as part of a package of vocational qualifications, and employers repeatedly emphasise the importance of such soft skills in improving an individual's readiness for work. Whether through increased funding to broaden the core aim of vocational study or through complementary study, it is particularly important that proposed programmes/ vocational qualifications incorporate soft skills. This would need to be tailored for specific groups of learners such as individuals with SEND to ensure it meets their wider access and progression needs.

In order to promote the effectiveness of personal and social skills, it will also be important to consider the low value placed upon these skills by some learners. Disengaged younger learners may be less likely to have been taught these skills at home/school and therefore do not value their currency or impact.

Question 3

What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?

Robust data is needed to determine the outcomes and impact of studying qualifications, particularly in terms of progressing into employment or higher-level study. Progression to higher study and employment would provide evidence of successful outcomes, as well as the scope for the qualification to widen participation amongst disadvantaged groups. Providers' ongoing ability to capture this progression data will underpin whether or not this measure can demonstrate success. This will help to promote the benefits of these qualifications to prospective learners, parents, schools, HE as well as employers.

Applied General Qualifications such as BTECs at Level 3 are a well-known and established brand for employers and universities. The qualifications support access to HE and employment, where an academic school-led pathway is not appropriate. This is because the content is often taught by industry trained tutors and work-related facilities. However, an additional observation made through the GLA's recently commissioned research¹ on non-continuation rates in London from full-time undergraduate study suggests that non-A level qualifications – in particular, BTECs – combined with living in the parental home puts some people at greater risk of not completing a degree. This affects Black students the most as they are more likely to have these two characteristics.

This research and the supporting data indicate that the picture in London is complex. Data alone will not provide a robust determinant of the impact of qualifications as other factors contribute to a learner's success as this study revealed. However, it is clear the BTEC plays an important role in widening participation and social mobility for Londoners. The BTEC Level 3 Diploma has been revised to include an externally assessed element. It is too early to assess the impact of this change but it was made, in part, to strengthen the academic standing of BTECs. HEIs are also assessing the type of pedagogy and support they provide to ensure an inclusive learning environment and improved student outcomes.²

The GLA is developing further pieces of research to commission during 2019, including on outcomes linked to the AEB in London as well as contextual admissions and student outcomes in London HE. These will provide richer data on progression and level 3 routes into higher education, degree attainment and graduate employment.

Question 4

How could we better use data about student outcomes to monitor and assess the success of future qualifications?

As above.

¹ Petrie, K and Keohane, N *Building on Success – increasing higher education retention in London*, Social Market Foundation (2019)

² For example, the *Transforming Transitions* initiative led by the University of Exeter, in partnership with Loughborough University, the University of Birmingham and Queen Mary University of London.
<http://socialsciences.exeter.ac.uk/education/research/projects/transformingtransitions/>

Question 5

Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.

The ten features listed present a pragmatic, sensible and credible set of quality features for publicly funded qualification and these should be further developed with regional Skills Advisory Panels; in the case of London, this should be the Skills for Londoners Board. If the core outcome of the review of qualifications is to align with future employment needs, then there should be alignment with Local Industrial Strategies and priorities of the mayoral combined authorities and GLA with devolved adult education budgets.

Question 6

Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.

The GLA is not providing an answer to this provider-facing question.

Question 7

Are there particular quality principles that we should consider for adults? Please give reasons for your answer.

Currently for Applied General Qualifications, cohorts of 16-18 and 19-23 year olds may be mixed together in the same teaching groups. This practice has benefits in terms of the range of experience of learners brought into the learning context and the efficiency of delivery, in terms of value for money. Prospective learners disengaged at pre-18, continue to require access to high quality vocational qualifications to enable their progression into further study or work.

Question 8

At level 3, what purposes should qualifications other than T Levels or A Levels serve:

a) for 16 to 19 year olds? Please give reasons for your answer.

Schools should highlight all post-16 study options to young people before the end of key stage 4. While the statutory careers guidance for schools³ makes the promotion of different pathways a mandatory requirement, evidence from recently commissioned research by GLA and London Councils has shown that this is not happening consistently. Schools must highlight all pathways from the start of year 10 at the latest, including academic, vocational and apprenticeships, including signposting to other establishments that offer relevant subjects (for example, if their own post-16 academic provision does not offer the desired subjects). The experiences of the young people interviewed by the GLA's and London Councils' research suggests that schools largely focussed on A level subject choices rather than the full breadth of options.

³ <https://www.gov.uk/government/publications/careers-guidance-provision-for-young-people-in-schools>

Young people should be offered taster courses before committing to a full level 3 course, whether academic or vocational to ensure they can make more informed choices.

b) for adults? Please give reasons for your answer.

Vocational qualifications for adults need to address the technical needs of a region across its industries. There is a risk that when compared to the range of current vocational qualifications, T Levels are too narrow to meet business and individual needs for progression. Relying solely on T Levels to deliver a simplification process, may risk reducing the range of skills within the labour market.

For adult learners, Level 3 and below qualifications, other than T levels or A levels can be a vital way to retrain or upskill, in a changing job market. Shorter courses may also be more relevant to meet business/ economic needs, for instance in digital skills.

As the Post-18 review of Education and Funding⁴ highlights, Level 3 and below qualifications should play an important role in boosting social mobility and widening access to a range of Level 4 and above qualifications, beyond the three 3-year degree model. However, at present the number of learners progressing from Level 3 qualifications on to Level 4 and 5 qualifications is very low.

The GLA will shortly be undertaking research on Level 4 and 5 qualifications in London, which will include an analysis of prior attainment of learners. This will provide vital data to inform our understanding of the ways in which Level 3 and below qualifications support progression to higher level study and widening participation.

Question 9

How should we determine “overlap” in relation to:

a) overlaps with T Levels? Please give reasons for your answer.

It is a concern that by limiting T Levels to a specific age group, provision would appear to be segmented in a potentially unhelpful way. Where appropriate, adults aged 19-23 should have the opportunity to access A or T Levels or vocational qualifications. This would help to address the skills and education needs of young adults and their access to vocational education to support their future progression. It would also provide colleges and other providers with the flexibility to meet needs more widely through cost effective delivery.

b) overlaps with A Levels? Please give reasons for your answer.

Government must demonstrate the value of both vocational and A level study programmes as they are very distinct offers with differing benefits. Evidence should be shared with schools and careers advisors of the benefits of studying vocational qualifications, particularly for those on lower levels of prior attainment. This can include analysis of outcomes achieved by those on vocational qualifications, plus their destinations and links with particular careers. The government’s move towards T levels should assist with this.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805127/Review_of_post_18_education_and_funding.pdf, May 2019

Question 10

How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?

Post-16 qualification reform and broader study would best support more positive progression outcomes if the design of new qualifications is sufficiently funded to provide the full range of personal and employment development skills, alongside the core vocational aim. This includes opportunities for funded English and maths at all ages, work experience and pastoral support. This inclusive approach will ensure that individuals have the best opportunity to succeed and progress.

In addition, research by GLA and London Councils has shown that some young people are placed onto a course that is not at the appropriate level for them. In London, the data suggests that young people are more likely to be pushed on to a higher level of course than they may be ready for compared with elsewhere in the country. For example, a significant proportion of students that achieved Level 1 at key stage 4, go directly into a Level 3 course at age 16 (normally a vocational course).

In other cases, there may be young people that only just achieved a Level 2 at key stage 4, potentially due to cramming to get over the line at GCSE, but would benefit from continuing Level 2 studies at age 16 in order to fully embed these skills before moving on to Level 3 study. And the outcomes for these over-reaching and borderline pupils are generally poorer than those who have comfortably achieved the previous level.

In many cases this may be a result of an anticipation that the student will complete their study within the traditional two years, rather than allowing for an additional year, which has financial implications for post-16 institutions

The GLA recommends that the government promotes and properly funds structured programmes of three-year study. This will help more people to achieve a positive Level 3 outcome in a vocational programme.

Question 11

How could post-16 qualification reform and broader study best support more people to achieve at level 3?

As above. Programmes must meet individuals' needs in a flexible and personal way, and also be appropriately funded.

Question 12

If level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice.

To increase the likelihood of level 2 qualifications leading directly to employment, the review must consult employers in sectors where Level 2 is an appropriate entry point for individuals, for example in some construction trades or in hospitality. The review should seek advice and

support from regional Skills Advisory Panels in determining how best to support employment routes from Level 2 for young people and adults.

Question 13

What are the key roles that qualifications at level 1 and below need to play?

Programmes at level 1 should focus on the core skills needed to progress to higher levels, and how these skills fit within the wider picture of lifelong learning, particularly where disengagement with the school system may have occurred. Level 1 is of critical importance in providing access opportunities to individuals, who may be disadvantaged and have lower attainment. Vocational focus as part of these programmes will support practical skills attainment and provide the opportunity to gain knowledge about a specific career alongside broader skills acquisition.

Question 14

Are there additional principles we should apply to level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.

The GLA is not providing an answer to this question.

Question 15

Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer.

There is a risk that withdrawal of existing qualifications may damage existing pathways to employment and progression to other vocational study routes, as the T Level does not yet have the current breadth of offer to ensure that all skills routes are fully available.

Question 16

Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.

The GLA is not providing an answer to this question.

Question 17

Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer.

Special attention should be given to niche or specialist delivery to ensure that vocational pathways are not lost. MCAs/GLA should be consulted prior to the withdrawal of any Level 3 programmes.

Question 18

Do you agree we should consider removing approval for funding from qualifications with low enrolments? Please give reasons for your answer.

Refer to response given to question 17.

Question 19

Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.

Refer to response given to question 17.

Question 20

Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND or others with a protected characteristic under the Equality Act 2010? Please give reasons for your answer.

Provision should be able to be tailored to address an individual's needs and be inclusive of meeting the needs of learners with SEND or others with protected characteristics.

Question 21

Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation? Please give details of any additional impacts below.

Any nationally proposed changes to level 3 skills and below funding that will impact the Adult Education Budget devolution to the GLA and Mayoral Combined Authorities should be highlighted. Devolved areas should have the freedom and flexibilities to determine what qualifications to fund within their areas to ensure local needs are met. Consideration should also be given to enabling flexibility to meet skills needs that continuously evolve, such as digital skills.

ENDS