



Review of post-16 qualifications at Level 3 in England: second stage consultation

Consultation response from the Sixth Form Colleges Association, January 2021

A. Summary: the vital role of applied general qualifications

- We share the government's ambition to create a world class education system that helps all students to fulfil their potential and meets the needs of employers. We also welcome the introduction of T levels and many of our members have already started to deliver these stretching new qualifications. But fundamentally, we do not agree that T levels and A levels should become the "*programmes of choice for 16 to 19 year olds taking Level 3 qualifications*". We believe that the newly-reformed, more rigorous, applied general qualifications (AGQs) have a vital role to play in the future qualifications landscape.
- The consultation is very clear that the government is committed to introducing a binary system of T levels and A levels at Level 3, where the vast majority of young people pursue one of these programmes at the age of 16. The government also intends to remove funding for the majority of AGQs to aid the introduction of this binary system.
- We believe that these proposals would be disastrous for the economy, employers, young people, social mobility and educational institutions. Instead, the government should retain the current three-route model of A levels, AGQs and technical qualifications. AGQs, like A levels, have recently undergone a process of reform and the new version of the qualification is much more rigorous and demanding, while technical qualifications are being transformed through the introduction of T levels.
- For many young people, an A level or a T level will not be the most appropriate route to support progression to higher levels of study or a meaningful job. Although AGQs are often available in similar subjects, they are a different type of qualification that provide a different type of educational experience – one that combines the development of skills with academic learning. However, it is clear that policymakers consider AGQs to be a barrier to increasing the take up of T levels – one of the Department for Education's key policy objectives. As a result, the government is set to embark on a misguided tidying up exercise that will leave many young people without a viable pathway at the age of 16.
- Far from driving up participation in T levels, significantly reducing the number of AGQs is much more likely to increase the number of young people enrolling on A levels. Some will succeed, many will not, and it is possible that some young people will drop out of education altogether. T levels are an important and welcome development, but they should succeed on their own merits, not by reducing or removing AGQs.
- To date, the government's approach to qualification reform has been to focus on what it is *adding* to the system rather than what it is removing. The rhetoric on T levels is compelling (new, stretching, large, employer-led qualifications), but much less has been said about the qualifications that will be de-funded in an effort to clear a path for their introduction. AGQs have a vital role to play in the future qualifications landscape – even one with two routes rather than three – and the case for retaining these qualifications is set out in this consultation response.

B. Key messages

- Our consultation response has seven key messages:
 1. Many students will be better served studying an AGQ rather than an A level or T level
 2. The government's definition of 'overlap' is narrow and unsophisticated
 3. The government has over-stated the degree of 'confusion' within the current qualifications landscape
 4. The government has over-estimated the role that T levels can realistically play in the future qualifications landscape, and the speed at which they can be introduced
 5. There is a range of practical barriers that will limit the uptake of T levels
 6. Moving to a binary model of A levels and T levels will disadvantage many students
 7. Removing AGQs will hamper social mobility
- These key messages address many of the specific questions posed in the consultation. We have developed our response in this way a. to ensure our key messages are clearly understood and b. because the consultation document focuses on how to implement a policy that we fundamentally disagree with.
- We have focused on the proposed academic route for 16 to 19 year olds. If the government proceeds with its plan for defining qualifications as either academic or technical, we suggest it uses the definitions adopted by Ofqual in its [Summer and Autumn 2020 Qualification Explainer Tool](#). Here, Level 3 AGQs are categorised as follows:
 - Signalling occupational competence (assessed by Ofqual as technical qualifications)
 - Qualifications with a mixed purpose
 - Qualifications used for progression to HE (assessed by Ofqual as academic qualifications)
- In most cases, Qualifications with a mixed purpose (like qualifications used for progression to HE) received a calculated grade rather than an adapted assessment. The vast majority of Level 3 AGQs delivered by our members fit in these two 'academic' categories.
- 1. **Many students will be better served studying an AGQ rather than an A level or T level**
- For some students, pursuing AGQs (either alongside A levels, or as part of a standalone study programme) will be a more effective way to develop their skills and achieve their ambitions than pursuing an A level or T level-only study programme.
- For example, many students who want to progress to professional practice higher education courses (e.g. public services, nursing and allied professions, pharmacy, optometry) benefit more from the applied/practical learning in an AGQ than they do from the more academic/theoretical learning in an A level. T levels primarily lead to skilled employment rather than higher education and are not available in all subject areas.
- Many students wishing to study at Russell Group universities undertake an applied general qualification alongside A levels, as they develop the practical skills (e.g. presentations, team work, project-based work) that are highly valued by universities. It is not unusual for students who have undertaken applied general qualifications to find the first year of a university course less demanding than their sixth form studies.
- It is a similar story for students who wish to pursue a career in sport and performing arts – the ideal model sits somewhere between the A level and T level route. Progression routes to elite status in both of these areas (where no T levels are planned) are internationally recognised as excellent – the AGQs are calibrated to strike the right balance of skills development and academic learning. This would be lost by moving to a binary model of A levels and T levels.

- An AGQ in sports science allows students to develop skills with expert coaches and access work experience, which they could not do through the A level equivalent. Students studying applied general qualifications in art and design develop a full portfolio of work to use during interviews with universities or art colleges - giving them a better chance of success.
- There are many other specific AGQs that play a unique role and must be retained. For example:
 - *Applied Science*. There is no A level equivalent (despite the suggestion in the consultation document), and students who have combined this qualification with A levels have progressed to HE and specialised in careers including radiotherapy and oncology, pharmacy, biomedical sciences, cognitive and clinical neuroscience, and paramedic science.
 - *Engineering*. This gives students an insightful experience of the profession, and studied alongside Physics and Maths A levels provides the ideal knowledge and skills to progress and flourish in degree-level engineering.
 - *Health and Social Care*. Again, a single qualification taken alongside A levels such as Biology provides the ideal preparation for further study in courses such as nursing and midwifery.
- Larger versions of these AGQs can be taken as alternatives to A levels rather than studied alongside them. As we identify later, qualifications like the Extended Diploma (equivalent to three A levels) play a vital role in helping students to remain in sixth form education, achieve a qualification and progress to higher education.

2. The government's definition of 'overlap' is narrow and unsophisticated

- The government's definition of overlap seems to be no more sophisticated than qualifications in the same or similar-sounding subjects. It is important not to confuse the purpose of a qualification with its content. T levels are designed to help young people progress to a very specific occupation. AGQs are designed to help young people progress to higher education or the workplace, often in professional careers. There is a need for AGQs to sit alongside A levels and T levels and this is true even where there is 'overlap' in terms of content.
- Some qualifications may appear similar, but actually offer a different experience and/or progression route. For example, an AGQ in business can be taken as part of a larger, more diverse programme that compliments other subjects and may lead to further study or employment; the T level in management and administration will be taken solely as a route into business. An A level in PE is primarily classroom study, including theoretical anatomy and biomechanics, while an AGQ in sport science prioritises the application of that theory and experience in leading teams and coaching.
- Qualifications may overlap in content, but do not overlap in their mode of teaching and assessment. AGQs are taught differently (more applied) and assessed differently (more coursework) than A levels and this flexibility is vitally important for some students. In many respects, the assessment and teaching style of AGQs is actually more suited to HE, as students are required to plan extended pieces of work for assessment and deliver presentations, for example.
- The International Baccalaureate (IB) Diploma is an excellent example of a qualification that 'overlaps' with A levels in content and progression route, but offers a different kind of teaching and learning experience. The IB is valued for providing an alternative to A level by offering a broad curriculum across six subjects, each assessed via both written examinations and coursework, and requiring that students develop strong study skills alongside their core studies via an extended essay. This is very similar to AGQs, which also allow students to undertake a broad curriculum via subjects like applied science, but are taught and assessed via a range of tasks including written exams, practical demonstrations, presentations, and coursework.
- Both the IB and AGQs (alone or as part of a mixed programme) facilitate entrance to highly competitive universities and professional employment. So it is unclear why the IB will (quite

rightly) continue to be funded, while many AGQs will not. Given that AGQs are disproportionately taken by the poorest students, while IB is mainly taught in private schools, the government's selective use of 'overlap' is not only narrow and unsophisticated, but elitist as well.

- It is also important that highly regarded, specialist qualifications such as those provided by the University of the Arts London (UAL) can continue to play a role in the future qualifications landscape. Despite the superficial appearance of overlap with some A levels (and potentially some T levels in the future) these are precisely the sort of successful, employer-backed qualifications that the government should be supporting.
3. [The government has over-stated the degree of 'confusion' with the current qualifications landscape](#)
- In making the case for a binary model, the government often refers to the "confusion" caused by having 12,000 qualifications approved for funding for 16-19 year olds (although the [original case for change document](#) concedes that there are actually 4,700 qualifications in scope of the review). This claim is repeated in the introduction to the stage two consultation (even though the focus is only on Level 3 qualifications).
 - Our members have reported very little confusion from a student perspective. There are only 39 AGQ subjects available across the entire sixth form college sector, and a similar number of A levels. So we believe the notion of widespread confusion is, from a student perspective at least, something of a myth.
 - There is also little scope for confusion when qualifications are well planned, bedded in and have demonstrable progression routes. Our members are able to share a rich history of AGQ success stories, particularly in STEM subjects and in those areas where a T level will not be available, such as sport and performing arts. One of the biggest risks in moving to a binary model is reversing the gains that have been made in developing AGQ pathways in recent years.
4. [The government has over-estimated the role that T levels can realistically play in the future qualifications landscape, and the speed at which they can be introduced](#)
- It is worth restating that we are supporters of, and advocates for, T levels. These stretching, high quality, employer-led qualifications have the potential to be a considerable advance on many of the tech level qualifications that they will replace. But it is unclear why these qualifications are being presented as a viable alternative to AGQs, and it is unrealistic to present them as part of binary offer with A levels. A more realistic aim would be for T levels to replace tech levels over the next few years as part of a strengthened three-route model.
 - [In 2020/21](#), 1,783 of the 1.1 million 16-19 year olds in full time education in England are pursuing a T level. Although low numbers are perhaps to be expected during the first year of T level rollout, the last date a student could begin a two-year 'technical' course that is deemed to overlap with a wave 1 or 2 T level under the current proposals would be September 2022. Even if T levels were a replacement for AGQs (and as we have already set out, they are often very different qualifications) the timescale for their introduction is wildly unrealistic.
 - Although the government has never set a target for the proportion of students that will ultimately pursue a T level, in a binary model, it is fair to assume that this might one day approach 50% of the cohort. But in 2018 (the most recent year for which [data](#) is available) just 4% of 16 to 18 year olds on a Level 3 programme were studying a technical qualification. Even accounting for qualifications that no longer feature in performance tables, the proportion of students pursuing a technical qualification has historically hovered around the 10% mark.
 - Given that the requirements for studying a T level are a good deal more exacting than the tech level qualifications they will replace, even a 10% market share may be out of reach in the short to medium term. Many colleges also require students to have a grade 4 or above in GCSE English and maths to enrol on a T level, making it difficult for many students to pursue this route even when the practical barriers below can be overcome.

5. There is a range of practical barriers that will limit the uptake of T levels

Even when T levels are fully rolled out, there will still be a range of practical barriers that will limit their uptake, and where AGQs will be needed. For example:

- **Time.** Some young people need a part time job (to support themselves or others) and this will not be possible for many given the size of a T level programme, even allowing for the recent flexibilities that have been introduced. There are clear implications here for disadvantaged students.
- **Availability.** There are some occupations and locations that T levels will struggle to penetrate, and alternative qualifications will need to be available to cater for these gaps:

Occupations: The 15 T level routes are not exhaustive, and there are some occupations where alternative qualifications will be required. We have already identified some of these, and students that want to progress to professional practice higher education courses (e.g. public services) will need to pursue a route that sits between A levels and T levels.

Locations: There will be some parts of the country where it is not possible to arrange a work placement, either because there are insufficient numbers of employers, or because there are insufficient numbers of employers willing to offer a placement. The recent flexibilities introduced on work placements are very welcome, but many employers in relevant occupations are either unwilling or unable to get involved. T levels will only be available in routes where work placements are available. The local labour market should not dictate the type of qualification that a student can pursue – a young person should not have to relocate to a different area to pursue a particular technical qualification.

- **Industry placements.** Industry placements of the required duration will be difficult to secure in some sectors. Some large employers already have an effective work placement programme and many SMEs lack the necessary infrastructure and resources to offer the meaningful, 45 day external placements which are required for completion of a full T level (and which make the T level so distinctive). The DfE has made significant efforts to address this, establishing the Capacity and Delivery Fund (CDF) as a pilot for T level placements, and publishing information on the benefits of taking part for employers. So far, these efforts have not come close to bridging the gap between demand for placements and employer supply, as the DfE's own evaluation research shows.
- The [process evaluation of CDF](#) carried out by the Institute for Employment Studies in 2018/19 found that “*many institutions failed to meet their targets. The qualitative research found differences between providers that had previous experience of employer engagement (including pilot providers and large general FE colleges with existing employer links) and those who did not, in particular sixth form colleges.*” This is particularly worrying considering that, in 2018/19, CDF recipients were only tasked with providing work placements to 10% of their technical students.
- And, as the case study below shows, even large, high-performing, General Further Education colleges with dedicated staff for employer engagement can struggle to generate a sufficient number of placements:

Sandwell College: T level Placement Case Study. In 2020/21, Sandwell - a large GFE college in a major city (Birmingham) with a successful track record in employer engagement - has a target of 390 CDF placements. Between September and October 2020, the college's staff made contact with 807 employers. Of these 807 employers, just 35 offered a placement - a 4% conversion rate. The college has already overspent its CDF allocation in pursuing these placements and will need to invest significant additional funding in employer engagement in order to come close to reaching its target. As this year's CDF delivery target is only 25% of technical students, providing T level placements to all of these students at this conversion rate would require contact to be made with 39,000 businesses (to achieve 1,560 placements). According to 2019 statistics from Birmingham council, there are only 43,950 businesses in the city in total. And a 4% conversion rate may prove optimistic over the next few years, given the effects of Covid-19 and Brexit on the economy, many of which are yet to be felt. Sandwell's

experience (including serious additional investment from a provider with real expertise in employer engagement) shows that even securing T level placements for only those students currently pursuing a technical course will be extremely challenging for most providers.

- Many colleges in rural or semi-rural areas are already concerned that T levels are a city-centric initiative and are hampered by the lack of employers generally, let alone employers willing to offer an industry placement. But as the Sandwell case study illustrates, this remains a major issue even in urban conurbations.
- **Breadth:** T levels are so large, it will not be possible to study other subjects alongside them.
 - The prospect of pursuing such a narrow, all-or-nothing programme from the age 16 could cause some students to disengage from education. The same is true in areas where only a limited number of T levels are available. If the only alternative were A levels, this would have a negative effect on skills development and social mobility.
 - T levels will be the right option for students who have a very clear and specific idea of their career path at the age of 15 or 16 and where a local college is offering a T level that meets this requirement. But the era of having a job for life is now over, and young people in the 21st century will change careers multiple times during their working lives. In that context, access to a broad, flexible education will become even more important in the future.
 - AGQs enable progression to adjacent employment areas or HE rather than preparing a student for a specific industry. For example, health and social care allows students to go into care, as well as multiple healthcare areas such as physiotherapy and radiology. The healthcare T level will not do this, requiring students to choose one tightly focused specialism such as optical care or pharmacy, and with no course content on social care.

6. Moving to a binary model of A levels and T levels will disadvantage many students

- The Department for Education's [impact assessment](#) is arguably more flawed than the consultation proposals it sets out to defend. Blind faith in the benefits of T levels (despite being operational for less than a term, the assessment confidently predicts that students will be *“more likely to find employment and [receive] higher earnings when they do”*) is combined with very cautious assessments of any potential downsides (e.g. it is estimated that only around 4% of 16-19 year olds will be unable to progress to Level 3 after the proposals are implemented).
- The impact assessment does concede that the government's proposals mean that it is *“inevitably likely to make it more challenging for some students to achieve level 3”*. For these individuals *“there is a risk that they may be worse off in terms of labour market outcomes and progression.”*
- However, the response to this prospect is far from reassuring. The impact assessment points to the T Level Transition Programme and says DfE will explore the idea of *“a new form of transition [which] could support students looking to progress onto level 3 programmes other than T levels”*. This transition support has yet to be defined, planned, or piloted with students and teachers. Given that it will need to be available by 2023, a timeframe which would be ambitious even if there were a clear plan in place to develop the programme, it is hard to escape the conclusion that the government is not serious about supporting the students that its own impact assessment concedes will be worst affected.
- The consultation also raises the possibility that these students could instead study a further Level 2 qualification. This is an astonishing proposal - reducing the terminal qualification levels of lower-achieving students - and is entirely at odds with the government's stated commitment to 'level up' opportunity.
- Three groups of students in particular are identified as having most to lose from the government's proposals:

- Students from Asian and Black ethnic backgrounds “*could be disproportionately negatively impacted*” given their current over-representation on Level 3 AGQs.
 - “*Those from SEN background are more likely to be affected [...] this could lead to these students being more strongly negatively impacted by being unable to achieve level 3 in the reformed landscape.*”
 - “*The proposals are anticipated to particularly affect students who previously received FSM, as they are more highly represented on qualifications we expect to no longer be offered, than those expected to remain.*”
- Again, the government must do much better than simply asserting that those who are able to achieve Level 3 will be pursuing qualifications that will deliver “*better skills and job market currency*”. Rolling out these proposals but only “*exploring potential mitigations against these negative impacts*” borders on the reckless.
 - The only way to mitigate the negative impact on students (particularly those in protected groups) is to ensure that students have the option to pursue AGQs rather being forced to pursue an A level or T level at Level 3, or an alternative qualification at Level 2.
 - Instability in the provider base will inevitably have a knock-on effect on students. Many providers will be surprised to read that the main benefit to them will be a reduction in the costs they incur when deciding on their qualification offer: “*the complexity of the qualifications market providers are faced with will be reduced, in turn minimising the recurring costs associated with deciding which competing qualification a provider wishes to offer.*”
 - As there are only 39 AGQ subjects available across the entire sixth form college sector, institutions will be more concerned about the loss of these qualifications and related progression pathways that have been developed and refined over many years. The impact assessment is less than reassuring about the risk of financial unfeasibility: “*in practice we would not expect this risk to be significant, as we would expect providers to successfully adapt their offer instead. We would anticipate a low likelihood that providers could go out of business, though a quantitative assessment cannot be undertaken at this stage.*”

7. Removing AGQs will hamper social mobility

- As we identify above, the government proposals will particularly disadvantage some groups of students - 11% of students on courses that will no longer be available are FSM recipients, and 24% are from the most disadvantaged fifth of areas. SFCA’s own analysis mirrors the national picture: our AGQ and mixed-programme students are poorer and achieved lower GCSE scores than their A level peers.
- Data from the Six Dimensions project (undertaken by Nick Allen of Peter Symonds College in Winchester and drawing on information provided by all SFCA members) highlights the vital role that AGQs play in ensuring students with lower levels of prior attainment **remain** in sixth form education, **achieve** a qualification and **progress** to higher education.
- For example, Six Dimensions shows that students with an average GCSE point score of 5.8 or below are more likely to remain in education through both years of sixth form on a mixed programme than an A level-only programme. For students with prior attainment below 5.2, students are more likely to remain on an AGQ-only programme than a mixed or A level-only programme.
- When it comes to achieving three A level equivalent qualifications, AGQ-only routes are the most effective for students with an average GCSE point score of 5.8 or below, followed by mixed programmes. For students with prior attainment below 4.7, those pursuing an A level programme have a less than 50% chance of achieving three A level equivalent qualifications compared to 70% for those pursuing an AGQ-only programme.
- For students with prior attainment below 5.2, students on mixed programmes are more likely to progress to higher education than students pursuing A level-only study programmes.

- Put simply, modestly-qualified students perform better when they study AGQs. This is not because AGQs are of a lower standard, but because their different learning and assessment methodologies make them more accessible to a wider audience. The quantitative evidence from Six Dimensions supports what we hear from our members that deliver AGQs: that lower-achieving students are frequently those who have gone to poorer schools, often in poorer areas, and therefore have lower levels of content knowledge and poorer study skills when they begin sixth form study. Others have simply, for whatever reason, underperformed in exam conditions – often resulting in a very real anxiety about future exams.
- AGQs allow these students to gradually, but rapidly, improve in a way that the linear A level does not. They are, in short, that rare thing in education we spend so much time looking for: a course of study that allows low-income students to alter their previous trajectories and ‘over-perform’ their statistically-determined destinies.
- There are countless examples of students that have progressed to the most selective universities with AGQs. Last year, 24% of the students that progressed to a Russell Group university from Franklin College in Grimsby did so after pursuing a mixed programme of AGQs and A levels. A third of these students lived in disadvantaged areas and half received bursary funding support during their time at college.
- More than one in ten of the students that progressed to Russell Group universities from New College Doncaster did so after studying a mixed A level and AGQ study programme. These students had an average GCSE point score of 5.67, versus 6.85 for A level only students. It is a similar story at Reigate College, where 22 students on programmes including an AGQ progressed to Russell Group universities in 2019. Again, students on a mixed programme (that make up 50% of the college body) had a GCSE average almost a grade lower than their A level-only peers.
- This shows that AGQs allow students to access the most stretching courses even with relatively low prior attainment. Some of these students might have thrived on an A level-only programme; but some, as is clear from the Six Dimensions evidence, would never have completed sixth form at all, let alone realised their potential by studying at a top university.
- However, the role of AGQs in aiding progression to higher education is not something that policymakers regard in a positive way. It is increasingly clear that the government believes too many young people progress to university and that many AGQ students would be better served pursuing a Level 4 or 5 technical course instead.
- This view is problematic in many ways, particularly for a government committed to ‘levelling up’ opportunity. For example, there are huge regional variations in the [rate of progression](#) to higher education. We know that 42% of young people in England progress to higher education by the age of 19. But this national average masks wide local variations – from 25% in Knowsley to 64% in Westminster. We also know that just 19% of students from the state sector progress to the most selective universities compared to 56% of students from the independent sector.
- And it remains to be seen if take-up of the government’s high status, technical alternatives to university will be just as high in Westminster (the London borough, but perhaps also the independent school) as it is in Knowsley.
- We also know that achieving a Level 3 AQQ confers a range of benefits, even if the student does not progress to higher education. [Government research](#) shows that the lifetime benefits of attaining a Level 3 BTEC are estimated at between £44,000 and £63,000. The same report notes that *"Vocational qualifications such as BTECs which focus on providing learners with general transferable skills as opposed to occupational skills have the highest rates of learner progression, particularly to Higher Education, as compared to other vocational qualifications such as NVQs or City and Guilds and RSA programmes."*
- This research is based on the less rigorous QCF qualifications; it is likely that the recently-reformed, more rigorous RQF qualifications deliver even greater benefits. Unfortunately, RQF qualifications have not been in place long enough for this research to be conducted. More

broadly, the government has shown little interest in drawing any form of distinction between the two, and ignores the reform of AGQs entirely in its consultation.

- ◆ The government seems convinced that reducing the number of AGQs will increase the take up of T levels. Our members are convinced it will actually increase the take up of A levels. Many young people that would otherwise have pursued a mixed or AGQ-only study programme will have no choice but to pursue an A level programme they are not equipped for. This in turn will lead to greater disengagement with education, increase the number of young people classified as NEET, and do irreparable damage to the government's 'levelling up' agenda.
- ◆ For more information about this consultation response, please email: james.kewin@sixthformcolleges.org