

## **Consultation response from the Sixth Form Colleges Association to the Department for Education's Review of post-16 qualifications at level 3 and below in England.**

### **Summary**

We share the government's ambition to create a strengthened technical education system that stretches students and supports their personal development. We also welcome the introduction of T levels and agree that there is a need to review the range of qualifications available at level 3 and below. But fundamentally, we do not agree that T levels and A levels should become the *"qualifications of choice for 16 to 19 year olds taking level 3 classroom based qualifications"*. We believe that the newly-reformed applied general qualifications (AGQs) have a vital role to play in the future qualifications landscape, and the success of T levels should not be at the expense of AGQs.

Before addressing the key questions in the consultation, it is important to address some of the definitions and principles that underpin the government's case for change. For example, the interim equalities assessment tells us that:

*"Reforms over recent years have done much to strengthen the quality and rigour of the core academic qualifications (A Levels, GCSEs) available in England at these levels. However, in 2016 the review of the Independent Panel on Technical Education chaired by Lord Sainsbury concluded that the large and complex array of technical, vocational and applied general qualifications currently approved for public funding was confusing, of variable quality and too often failing to deliver skills that employers and our economy need."*

This overlooks the recent reform of applied general qualifications and suggests they are not considered to be *"core academic qualifications"*. AGQs were also outside the scope of Lord Sainsbury's review, so it is not right to suggest they were part of *"the large and complex array"* of qualifications in need of reform. The *Independent Panel on Technical Education* clearly defines applied general qualifications as part of the academic route to higher education or employment.

Definitions matter. The Sainsbury vision of choosing an academic or technical option at the age of 16 has been redefined as choosing from an A level or a T level for those pursuing classroom-based study. Both are described as *"gold standard"* qualifications. Leaving aside the wisdom of describing something that does not yet exist as *"gold standard"*, it sends out the clear message that all other qualifications will be, at best, silver or bronze. This is not a sound basis on which to conduct an impartial consultation.

Our response to this consultation is informed by the experience of our members. They have seen how applied general qualifications have transformed the life chances of hundreds of thousands of young people and made a huge contribution to both social mobility and economic growth. They are also united in the view that AGQs - in their new, more rigorous format - should sit alongside T levels and A levels as the *"qualifications of choice for 16 to 19 year olds taking level 3 classroom based qualifications"*.

There is little support amongst our members for presenting students with a binary choice at the age of 16. For some 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 available in similar subjects, they are a different *type* of qualification that provide a different *type* of educational experience. Many young people will require a different pathway to that offered by A levels or T levels, even if their final destination is ultimately the same.

### **Consultation responses**

The title of this consultation is *Review of post-16 qualifications at level 3 and below in England*. We have focused our responses on the questions that are most important to our members - those that relate to making the case for retaining applied general qualifications.

It is clear from the consultation and supporting documents that this is a case that needs to be made. As we noted earlier, the government's vision is of a binary system with two "*gold standard*" qualifications. AGQs do not fit neatly into this vision and many searching questions are asked about their role and purpose. This is entirely legitimate, but at times the consultation oversells the case for T levels (that do not yet exist) and does not consider A levels as they are out of scope (so there is no suggestion of removing A levels that "*overlap*" with AGQs for example).

Some questions can be dealt with relatively quickly. For example, we agree that qualifications with no enrolments in the past two years should not be approved for funding in the future. The government often refers to the "*confusion*" caused by having 12,000 qualifications approved for funding for 16-19 year olds (although the case for change document concedes that there are actually 4,700 qualifications in scope of the review with enrolments in 2016 and 2017).

Our members have reported very little confusion from a student perspective. Schools and colleges set out the range of courses they offer and students select the qualifications they wish to pursue. They do this based on information, advice and guidance that includes evidence of how qualifications can help them to progress (and well developed curriculum models mean the evidence for AGQs is now very clear). Universities set out their entry requirements for individual courses and this includes qualifications, subjects and exam grades. So we believe the notion of widespread confusion is, from a student perspective at least, something of a myth.

Furthermore, many of our members are concerned that having successfully developed and refined progression pathways based around AGQs for many years, this progress could be undone through a top-down rationalisation of qualifications. There is little scope for confusion when qualifications are well planned, bedded in and have demonstrable progression routes. Colleges 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.

We also agree that funding for pre-existing qualifications should be removed. It was a mistake to allow a mixed economy of “pre-existing” and “redeveloped” applied general qualifications to operate and this has proved far more confusing than the number of qualifications approved for funding.

- 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.**

Not all young people will know at the age of 15 or 16 if they wish to enter skilled employment at the age of 18 or progress to higher education. The consultation document appears to suggest that the “varying amounts of flexibility” in the current system is not a good thing. We think it is. A levels, AGQs or a combination of the two provide the sort of general education that equips young people well for the workplace or higher education (and we presume the government does not believe the recent decision to allocate UCAS tariff points to T levels will damage their “clarity and distinctiveness”).

The opportunity to combine A level and AGQs is particularly helpful for students who do not have fully formed career plans. Colleges and schools have successfully developed this combined approach over many years and removing the option will lead some young people to disengage from education, reversing much of the progress that has been made to increase participation. AGQs help students to keep their options open. One sixth form college provided the following example:

*“From an AGQ in Business last year, our students progressed to university courses in subjects as varied as law (at a Russell Group university), accounting and finance, business management, events management, property management, marketing and criminal psychology. From the same qualification, students also progressed directly to employment in sectors such as accounting, sales, construction and logistics. For many of these students, A levels would have been less accessible and not supported the vocational skills development required; T-Levels would have been too prescriptive and would not have supported progression to such a broad range of HE courses”.*

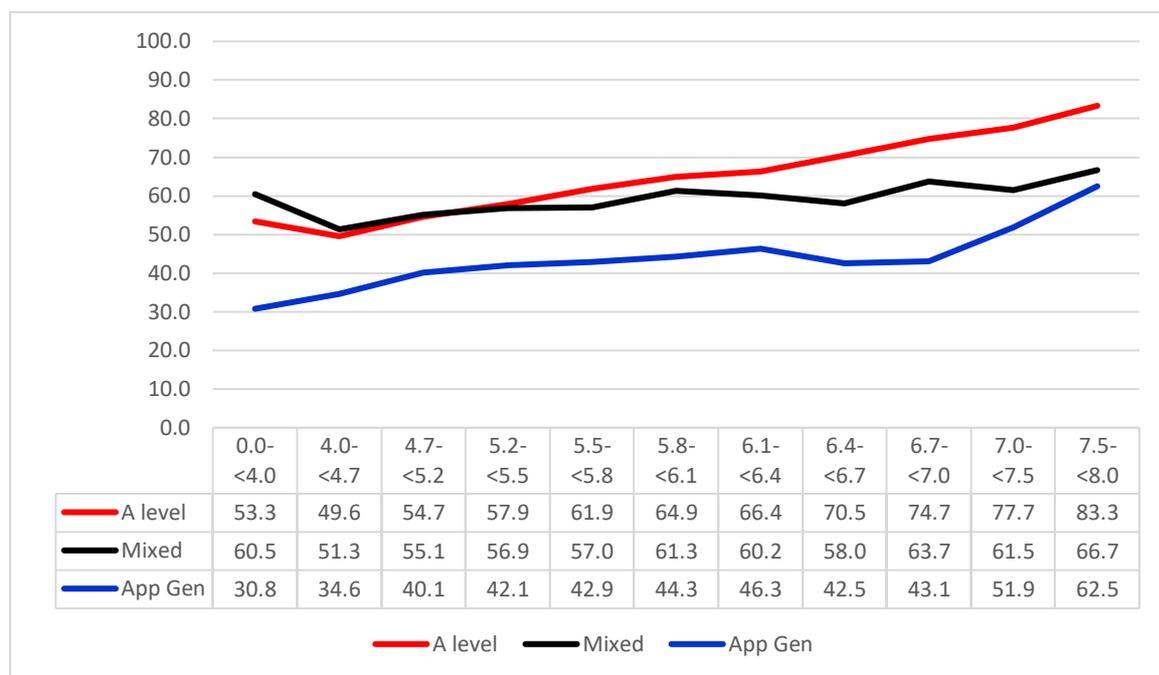
T levels will be right option for students that have a very clear and specific idea of their career path at the age of 15 or 16 and where a local college is offering a T level that meets this requirement. But the era of having a job for life is now over, and young people in the 21<sup>st</sup> century will change careers multiple times during their working life. In that context, access to a broad, flexible education will become even more important in the future.

- 2. 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?**
- 3. How could we better use data about student outcomes to monitor and assess the success of future qualifications?**

The starting point for determining whether applied general qualifications deliver successful outcomes is an open mind. For example, policymakers are often quick to compare university

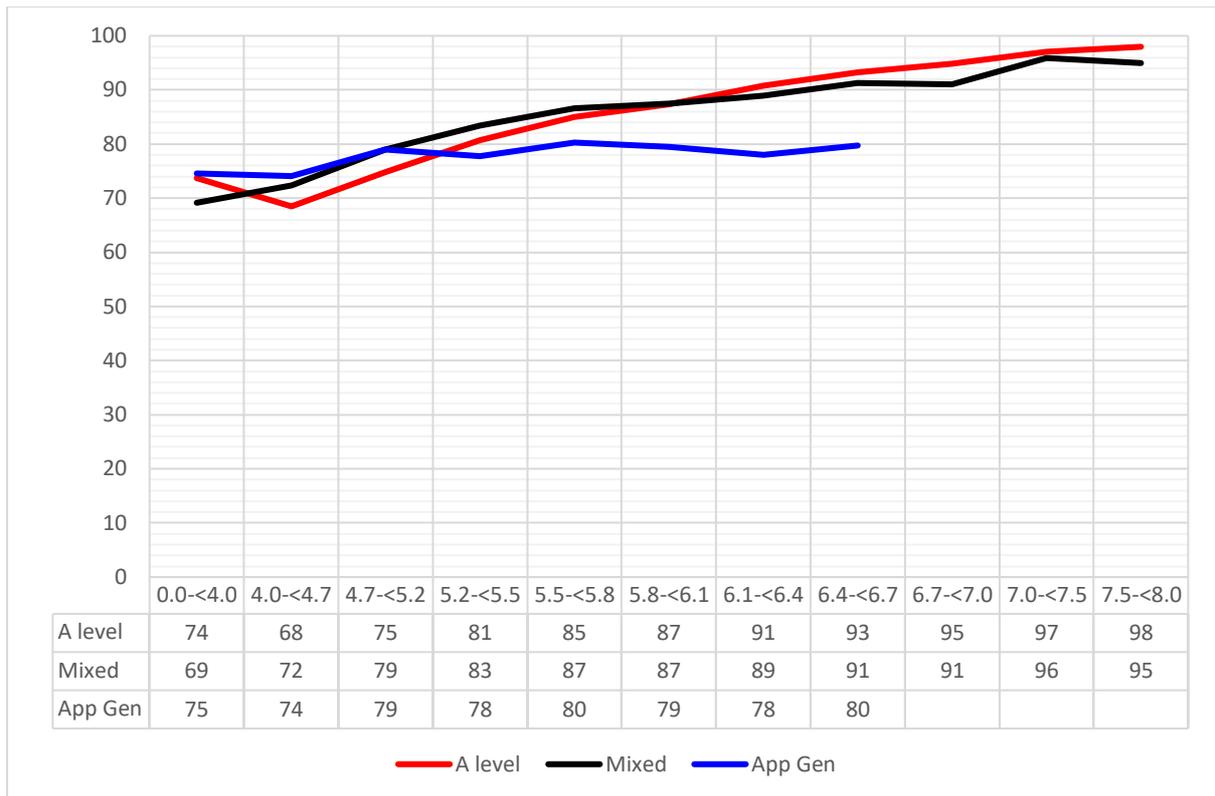
drop-out rates between students entering higher education with one or more applied general qualifications and students that pursued an A level-only study programme. But any meaningful comparison must consider a range of other variables, particularly prior attainment and levels of disadvantage. The support provided by universities is also a factor – some institutions have taken longer than others to adapt their support offer to students that have progressed to higher education from non-A level pathways.

Applied general qualifications have helped hundreds of thousands of young people stay in education, achieve in education and progress to higher education. Crucially, many students would not have been able to do any of the above with an A level-only study programme. Using data from the SFCA Six Dimensions project (undertaken by Nick Allen of Peter Symonds College in Winchester and drawing on information provided by all sixth form colleges and 16-19 academies) we set out some data below to support this case.



**Figure 1: university progression in 2018 by curriculum pathway (completers only)**

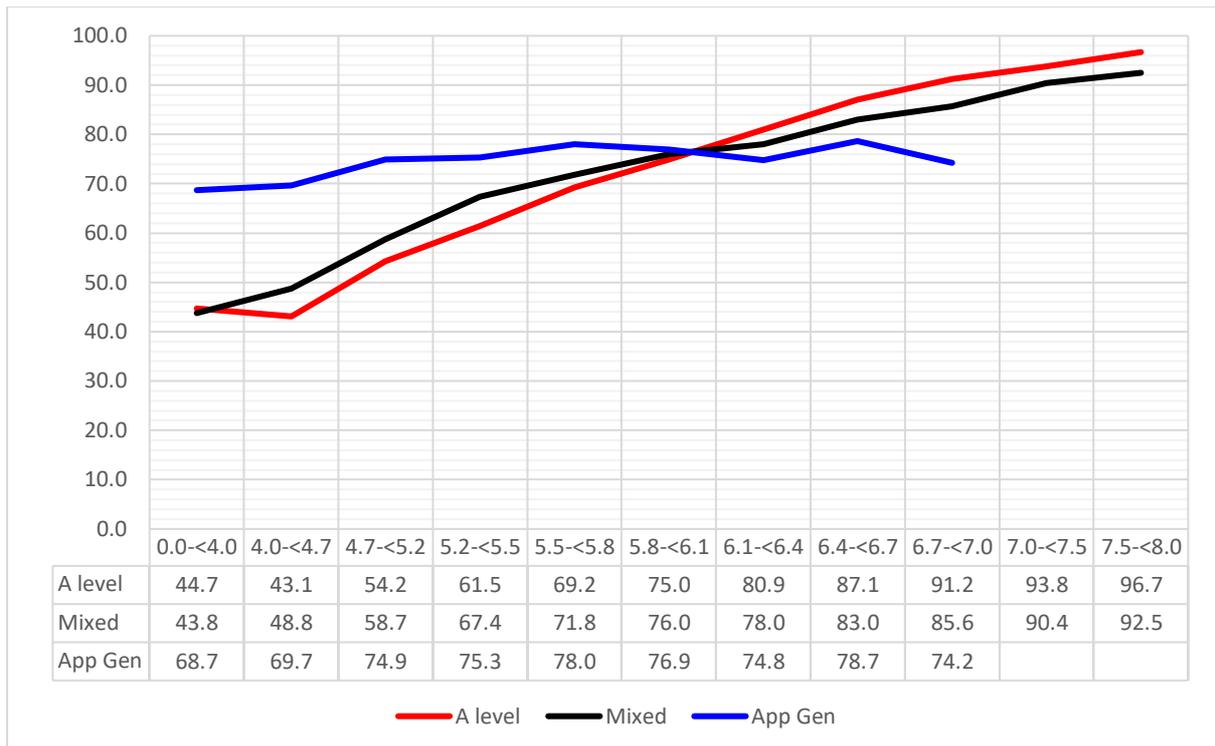
Figure 1 highlights the proportion of students in each of the three main programme types (AGQ only, mixed AGQ and A level, A level only) that progressed to university but - and this is the crucial factor - divides these students into prior attainment bands based on their GCSE score. For students in the lowest three prior attainment bands, mixed programmes are actually *more* effective at getting students to university than A level only programmes. Mixed programmes allow more students to progress to university, where assessment embraces both coursework and examined models - just like a mixed programme.



**Figure 2: Retention measured by completing at least one course in the summer of the upper sixth year (2016-18 cohort) by curriculum pathway**

Figure 2 compares retention by curriculum pathway. Note that for students in the bottom five prior attainment bands, retention is higher for students on mixed programmes than it is for students on A level only programmes. Retention for applied general only programmes is highest of all in the bottom three attainment bands.

Figure 3 continues this analysis by looking at the proportion of students in each band on each route who successfully achieve three or more A levels worth of qualification. This is an uncompromising measure because it does not count those students that leave having achieved two A levels or equivalent, even if they have an entirely positive destination. We find that for average GCSE scores below 5.8, the strongest route is applied general in term of acquiring a breadth of achievement equal to three A levels. Mixed programmes are similarly successful to pure A level programmes, but at average GCSE scores below 5.8, they are a stronger route than A level by around five percentage points. In the bottom two bands, students starting an A level programme have a less than 50% chance of success. In an applied general only programme, a student’s chance of success by this measure is 70%.



**Figure 3: Attaining three A level passes or passes of equivalent width**

It is clear from Nick Allen’s analysis that applied general qualifications have a vital role to play in retention, achievement and progression – particularly for students with lower levels of prior attainment.

This is of particular importance in subjects like STEM. Many students perform well in their GCSEs but may not have secured the grade 6 or 7 that schools and colleges now typically require in order to study A levels in subjects such as chemistry or physics. To pursue careers in areas such as health science, radiography or occupational therapy a science qualification is important, but A levels may be out of reach. A T level will often be too narrow in scope and lack the necessary currency in HE.

As we noted earlier, the common refrain from policymakers that students with applied general qualifications are more likely to drop out of university is spurious as it does not take into consideration other factors such as prior attainment (lower), levels of socio-economic disadvantage (higher), or the nature of the support provided by universities. Monitoring rates of progression to, and retention in, higher education is important, but in doing so it is important to look beyond the curriculum path students have chosen. The same is true when looking at data linked to employability levels or wage returns.

- 4. At level 3, what purposes should qualifications other than T Levels or A Levels serve for 16 to 19 year olds? Please give reasons for your answer.**
- 5. How should we determine “overlap” in relation to: a) overlaps with T Levels? Please give reasons for your answer. b) overlaps with A Levels? Please give reasons for your answer.**

In her foreword to the consultation, the Rt Hon Anne Milton MP sets out a clear vision: *“Everyone should be able to benefit from world class education and training. We want all students, regardless of their background or needs, to develop their talents and skills and achieve their ambitions.”* We agree, and believe this underpins the ultimate purpose of all qualifications. But we also believe there must be a third pathway to this destination. For some students, pursuing applied general qualifications, rather than A levels or T levels, will remain the most effective way to develop their talents and skills and achieve their ambitions. AGQs can help all young people to acquire the key skills valued by employers and universities, but set out below are specific examples of students that would benefit from an AGQ or mixed study programme rather than an A level only programme:

- **Students that are high achieving.** Many students wishing to study at Russell Group universities undertake an applied general qualification alongside A levels as they develop the sort of practical skills (e.g. presentations, team work, project based work) that are highly valued by universities. It is not unusual for students that have undertaken applied general qualifications to find the first year of a university course less demanding than their sixth form studies.
- **Students that want to pursue a broad study programme.** For a huge number of students an appropriate study programme is one that includes a combination of AGQs and A levels. This provides variety, and can allow students to focus on a broad area – by combining A level maths with AGQs in science, computing or engineering for example.
- **Students that have an interest in a particular field.** Through applied general qualifications, students are able to study and develop their skills and knowledge in an area they have a keen interest in. For example, 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 HE interviews - giving them a better chance of receiving a university offer.
- **Students that want to gain practical skills.** Applied general qualification are particularly useful for areas of work requiring practical application of knowledge such as computer programming and laboratory work. These students may lack the GCSE grades required in English to study A levels, and yet excel in areas requiring a different skill set.
- **Students that have modest GCSE results.** Applied general qualifications also provide an opportunity for students with modest GCSEs to progress to Level 3 and be successful. This is especially true in STEM subjects, where A level success is limited to those with the highest level of GCSE matriculation. AGQ students are the next generation of (for example) pharmacy, biomedical science and nursing undergraduates and degree apprentices. Removing AGQs in STEM subjects would dramatically reduce the number of Level 3 STEM students progressing to higher education - reversing a trend that has increased sharply in recent years.
- **Students that struggle with exams.** Many students do not perform well in an exam environment. Their skills and style of learning may be more suited to a qualifications like AGQs where an element on non-exam assessment provides milestones for students to work towards whilst at the same time building their confidence and self-esteem. It also

prepares them well for university as they are already attuned to target setting, regular deadlines and coursework related assessment.

There are also many subjects in which students are more successful in progressing to higher education with an AGQ rather than an A level or T level-only study programme. Midwifery is a good example - an applied general qualification in health and social care is a better preparation for higher level study - partly because of the work experience element, and partly because of the specific content that is not covered by A levels. Ultimately this is an academic progression route, so a T level would not provide the right focus and there is no longer an A level in health and social care.

Developing the early years educators of the future is currently done particularly well through applied general qualifications at Level 3 like the CACHE diplomas and BTEC Nationals in Children's Play, Learning and Development (CPLD). These AGQs recognise the need to 'professionalise' students through placement and academic input but rely on a variety of placements to provide students with the wide range of opportunities needed to progress to roles in nursery nursing and primary teaching. A levels would not equip these students as well and T level structures (particularly the requirements on industry placements) would not support this professional, rather than technical, development in the same way.

The same is true of students wishing 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.

Even when T levels are fully rolled out, there will still be a range of practical barriers that will limit their uptake, and where an alternative qualification 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, locations and sectors 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.
  - **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.

- **Sectors:** Work placements of the required duration will be difficult to secure in some sectors. Some large employers already have a work placement programme and many SMEs lack the necessary infrastructure and resources. In August, a survey from CIPD found that three quarters of UK employers would be unable to offer a work placement of at least 45 days.
- **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 was A levels this would have a negative effect on skills development and social mobility. In some respects, T levels would be a more appropriate option at the age of 18, when a young person has had a further two years to complete their general education

It is important not to confuse the purpose of qualifications with their 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. As we have set out in this response, 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.

And finally, it is not just AGQs that risk being squeezed out in a world where only A levels and T levels exist. Academic qualifications such as Core Maths, the Extended Project Qualification and the International Baccalaureate (IB) do not fit into either camp but are highly valued by students, universities and employers and it would be a mistake to remove them. The IB has practically disappeared in the sixth form college sector (largely because of funding pressures) but is extremely effective at preparing students for higher education. The IB Career-related programme combines academic and vocational courses and can also help young people progress to higher level apprenticeships or employment.

- 6. 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.**
- 7. 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.**

Students from disadvantaged backgrounds would have the most to lose from a binary education system of A levels and T levels. As we have already noted, an A level only programme is not, and will not, be the right pathway for some young people. Many students from disadvantaged backgrounds need a part time job to support themselves or others and this would make it difficult to pursue a T level – even if that were the right pathway for them.

A binary offer is not flexible enough to work with the most vulnerable (but potentially very productive) young people. AGQs can help to level the playing field for young people that experience a range of disadvantages. For example, underperformance at Level 2 (due to SEND, lack of ESOL provision, illness, poor family support networks etc.) can mean that students take longer to progress and need a more flexible pathway. As we noted earlier, AGQs are highly effective at helping young people stay in, achieve, and progress from education.

Our members have real concerns about the impact on participation and social mobility if applied general qualifications are reduced or removed. The impact assessment that was published alongside the consultation does not appear to share these concerns. For example, for students that switch to other courses following withdrawal of funding for existing courses *“we would anticipate that they would benefit from a higher quality, more rigorous education, leading to improved progression to further education and higher wage returns”*. And once the new system is up and running *“A minority of students may not find a suitable course and so disengage from education or training...however, our intention is that the reforms will strengthen engagement amongst students as the review will simplify the array of qualifications making routes into employment clearer.”*

Ours is an optimistic, forward looking sector. But the above assessment looks rather like wishful thinking. Applied general qualifications have been developed and embedded over many years, and as this consultation response has highlighted they have had an enormous impact on students – including those from disadvantaged backgrounds. This progress could easily be removed by a rushed process of defunding qualifications to clear a path for T levels. If this were to happen, it would be disadvantaged students that would have the most to lose.

### **More information**

For more information about this consultation response, please contact James Kewin at SFCA: [james.kewin@sixthformcolleges.org](mailto:james.kewin@sixthformcolleges.org)