



Department
for Education

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

Government consultation response

23 October 2020

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Introduction

1. On 19 March 2019, and in response to the public consultation on the implementation of T Level programmes¹, the government launched the first stage consultation to gather views and evidence about the principles that should apply to post-16 qualifications at level 3 and below in England.
2. The current qualification landscape at level 3 and below is complex, comprising more than 12,000 qualifications of varying types, sizes and design features. The aim of the review is to ensure that every single qualification approved for public funding is necessary and has a distinct purpose, is high quality and supports progression to positive outcomes, as part of a simplified landscape.
3. In the first stage consultation we outlined our intention to secure early progress on our ambition to simplify the system by removing funding approval from August 2021 from qualifications we had identified as having low or no publicly funded enrolments. The removal of these qualifications would ensure the offer is smaller, easier to navigate, and only includes qualifications for which there is a clear demand from schools, colleges and students.
4. The department received 538 online and emailed responses to the consultation. The responses were analysed both internally by department officials and by an external consultant, NLH Partnership Ltd.
5. The official government response to the feedback received on the questions relating to the removal of funding approval from qualifications with low and no enrolments was published in February 2020.
6. The following sections of this document set out the response to the remaining questions and take account of all submitted responses in addition to those made during engagement meetings with stakeholder groups. These findings have informed the policy proposals for the next stage of the review of post-16 qualifications at level 3, on which the department is now consulting.
7. To deliver a reformed level 3 landscape we also need to understand how qualifications at level 2 and below support progression to level 3 or provide students with the essential skills they need for sustained employment. Therefore, in addition to the [second stage consultation](#) we will shortly launch a call for evidence about level 2 and below study.

¹ DfE (2018). '[Implementation of T Level programmes consultation response](#)'. The T Level consultation response described these reviews as two separate processes. This consultation brings those reviews together.

Structural format of this response

8. As we are publishing this government response alongside the second stage consultation and will shortly publish a level 2 and below call for evidence, we have given thematic responses, linking to where readers can find further detail. The list of questions and where the response is addressed can be found at [Annex A](#).

Consultation exercise

9. The first stage consultation was launched on 19 March 2019 and closed on 10 June 2019. It consisted of a total of 26 questions, the first five of which asked for respondents' details (such as name, role, and any organisation on whose behalf they were responding). Of the 21 main consultation questions, 11 included a Yes/No response format, although all questions invited respondents to provide qualitative, text-based responses and comments.

Profile of respondents

10. In total 538 respondents completed the consultation. Of these, 504 provided online responses with a further 34 responding via email. Figure 1 provides a breakdown of respondents by 'respondent type'.
11. The analysis of the consultation included:
 - Full thematic analysis for key themes - it was common for a single response to be coded to more than one theme.
 - Reviewing responses to the closed questions in the consultation.
12. The consultation generated high levels of interest with a large variety of opinions expressed. Some questions generated a higher response rate than others. For example, the question relating to the purpose level 3 qualifications should serve for 16 to 19 year olds had a higher response rate than questions relating to purpose level 3 qualifications should serve for adults.
13. On a number of questions, responses were unclear, did not address the question, or respondents provided a general view of post-16 qualifications. For example, there was a lack of understanding or agreement about what the term 'purpose' meant, resulting in respondents interpreting it in numerous ways.

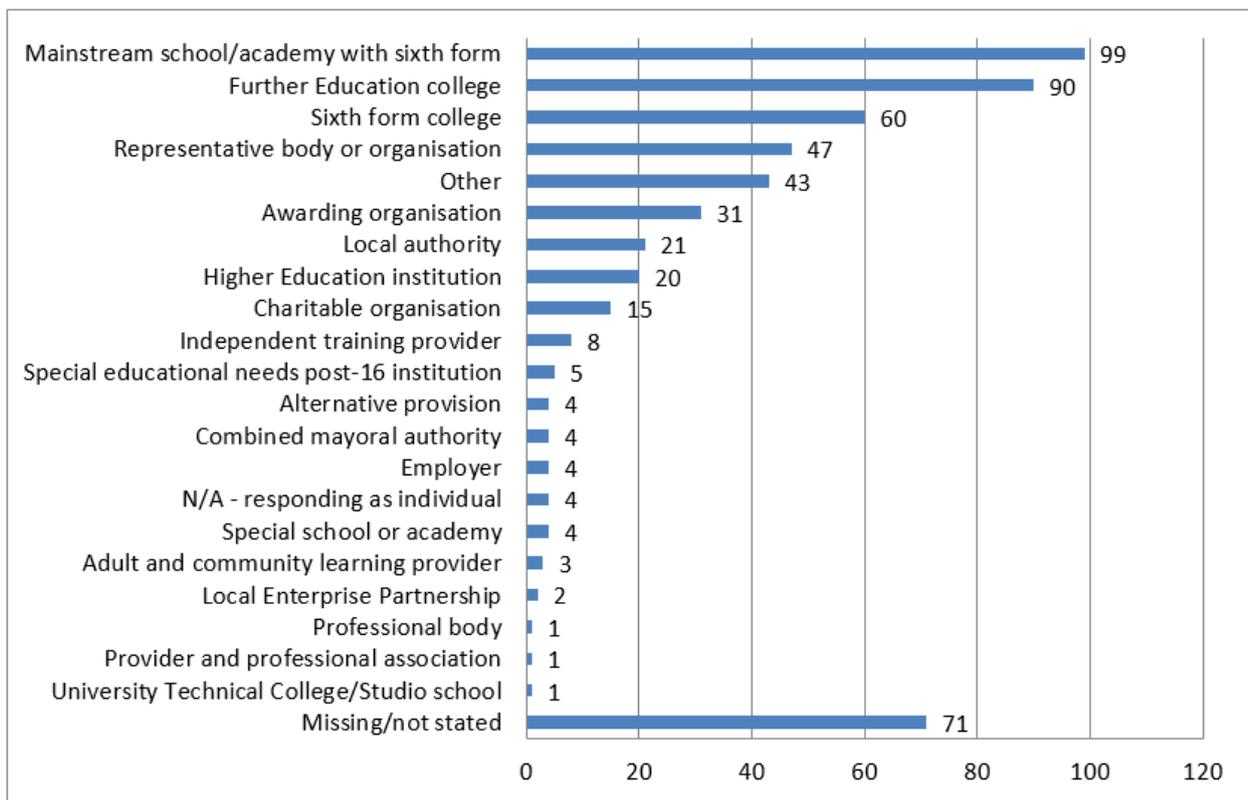


Figure 1: Consultation respondent by type.

14. The small number of some respondent types, such as employers² and Awarding Organisations (AOs), limited the scope for meaningful comparison of providers with other respondent types, although it was carried out where possible.
15. During the consultation analysis we became aware of a number of ‘campaign’³ responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme.

Stakeholder Engagement

16. Prior to the consultation closing, the department held a wide-ranging stakeholder engagement process. This included:
 - Five large-scale consultation events.

² Although four respondents gave their respondent type as ‘Employer’, examination of the detail they provided about their role and organisation indicated that only one of these was an employer.

³ Three separate ‘campaigns’ were identified, one accounting for 35 responses, another for 12 responses, and the third for two responses.

- Round-table sessions with AOs, Mayoral and Combined Authorities, business representatives and other government departments.
- On-site provider visits.

Executive Summary

17. Students and employers face a bewildering choice between 12,000 different qualifications funded in England at level 3 and below. Our aim is to simplify the system so that young people and adults have clearer choices, with improved lines of sight to skilled employment or further study. We want employers and students to have confidence that every single qualification is high quality. Our reformed skills system will have employers at the centre, basing provision on employer-led standards and strengthening the links between the classroom and the workplace.
18. Our first stage consultation was the first step in reforming the post-16 level 3 and below qualifications landscape in England. We have already started to implement some of these reforms by making early progress in the review where we can (see more detail below), but we have also taken time to listen to the sector and take account of consultation views before setting out more detailed proposals for further consultation before we make final decisions. The [next stage of the consultation](#) launched today invites views on these proposals. The findings summarised in this government response have informed the policy proposals in the consultation.
19. The consultation focusses on level 3 qualifications. Before we set out proposals to reform study at level 2 and below, we want to understand more about what role this plays post-16 and how it should fit with an evolving level 3 landscape. We will shortly be launching a call for evidence on these themes.

Second stage consultation on post-16 level 3 qualifications in England

20. In our first stage consultation we signalled our intention that T Level and A levels should be the programmes of choice for 16 to 19 year olds taking level 3 qualifications. We still believe this is and the unprecedented challenge posed by the COVID-19 pandemic means reforms have never been more important than they are now.
21. We received a large number of responses to this consultation with valuable user insights into what other level 3 qualifications should be offered alongside A levels and T Levels. We have thought carefully about the suggestions as we developed our proposals. We have listened to your feedback and we are proposing to fund a small range of qualifications that will be taken alongside or instead of A levels and T Levels. In doing this, we believe the landscape will be easier to understand, qualifications will be better quality, and students will have a clear line of sight onto the progression routes or outcomes they deserve.
22. We are also transforming technical education in this country by strengthening the links between the classroom and the workplace. By putting employers at the heart of every technical qualification and aligning to the employer-led standards on the

Institute for Apprenticeships and Technical Education's Occupational Maps⁴, our reforms will make sure everyone has the opportunity to gain the skills needed to enter employment, progress in their careers, or enter higher levels of education.

23. These proposals are set out in the [second stage consultation](#), which is published alongside this response.

Level 2 and below call for evidence

24. We agree with the feedback received that study at level 2 and below should be meaningful to students, parents, carers, providers and employers. Getting level 2 and below right is key to making sure that students have clear lines of sight to level 3, apprenticeships, traineeships, and for some, directly into employment.
25. We want our further education system to be much clearer about who and what classroom-based study at level 2 and below is for. All programmes and qualifications at these levels should have clear purposes, target cohorts and progression routes. The call for evidence we will publish shortly will help us understand what and who classroom-based study at level 2 and below is for and how it fits into the rest of the further education landscape. We will set out more detailed proposals on level 2 and below study next year, once we have considered the evidence put forward.

Making early progress – decisions already made and implementation underway

26. In our first stage consultation, we outlined our intention to secure early progress where possible. The action we have taken below has allowed us to stabilise the publicly funded offer ahead of our proposed wider reforms.
27. **Confirmed the removal of public funding from 163 pre-existing qualifications.** With effect from 1 August 2020, funding approval has been removed for new enrolments from 163 qualifications where a reformed version already exists. The list of qualifications affected and guidance for providers of education and training can be found online [here](#).
28. **Moratorium on new qualifications being approved from September 2020.** In October 2019, and updated in April 2020, we published our [technical guidance](#) for AOs on the moratorium on approving new qualifications at level 3 and below for funding. From 1 September 2020, we stopped considering new regulated

⁴ Institute for Apprenticeships & Technical Education (2020). '[Occupational Maps](#)'.

qualifications for funding approval for students aged 16 and over (including 19 plus), unless they can be classified as exceptions as defined in the online guidance. The moratorium will last initially for a period of three years and will apply to all ESFA funded offers at age 16 and above. It will not apply to qualifications approved for students aged 14 to 16, or new qualifications that are mandated for an apprenticeship. We recognise the challenges of COVID-19 for AOs over the last six months. Therefore, we have agreed to implement a process whereby we will consider newly regulated qualifications up to and including 19 October 2020, where it is clear regulation of those qualifications have been delayed and where they do not meet exemption criteria.

29. Announced the removal of approval for public funding from qualifications with low or no enrolments. On 13 February 2020, we announced [the process](#) through which we will confirm which qualifications with low or no enrolments will have approval for public funding. We will confirm in November 2020 the qualifications with no enrolments which will have funding approval removed from 31 July 2021. Due to the unprecedented circumstances of COVID-19 we suspended the process for qualifications with low enrolments, and the qualifications included on the published list will retain their funding approval for 2021 to 2022. This process will be launched later this academic year with funding approval removed from August 2022 for qualifications with low or no enrolments.

Summary of responses received and the government's response

Purpose of qualifications

Question 6: 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?

Summary of responses

30. Of the 382 respondents who provided a clear response that addressed Question 6, 225 (59%) provided a suggestion for how the clarity of purpose might be extended.
31. While most agreed with the general principle that qualifications should have a clearly defined purpose, respondents tended to disagree with the definition of 'clarity of purpose'. Typically, this was because they felt 'clarity of purpose' should not require a qualification to lead to a single intended outcome.
32. Respondents highlighted that students, and in particular students aged 15 or 16, are often uncertain about which routes they wish to pursue. For this reason, 'clarity of purpose' should not focus on a specific employment or educational outcomes as student choices can often be dictated by what they can do and what they enjoy. Additionally, as qualifications serve different purposes for different students, the definition should also value the 'softer' side of learning, namely personal and social development, and team working.
33. Improvements to the mapping of progression pathways and greater alignment and consistency of terminology were also cited as ways of providing clarity of purpose.

Government response

34. We appreciate the concerns in relation to a narrow definition of 'clarity of purpose', which could disadvantage students who are less certain about which route to pursue after key stage 4.
35. We agree that the choices available to young people should be clearer and routes through post-16 education should be easier to navigate. The current system, with similar qualifications of varying quality is unfair and confusing.
36. For students, whether their aim at age 18 is to move into skilled employment or to pursue further study, they need to be confident that the qualifications they have chosen will provide them with the best possible preparation to take their next step. For employers and HE providers looking to recruit and attract students following post-16 education, qualifications need to clearly show what knowledge and skills the holder can demonstrate.

37. As outlined in the *Level 3 qualifications for 16 to 19 year olds* chapter of the second stage consultation document, we propose to align the significant majority of post-16 technical education to employer-led standards, with level 3 qualifications providing the student with at least occupational entry-level competence. This will provide clarity and consistency in the mapping, titling and terminology used for technical routes through the system whilst also ensuring that young people have the right skills and knowledge to support their next steps, whether into further study or employment.
38. It will be absolutely vital that students receive the right information, advice and guidance (IAG) so that they are able to choose the right option from the streamlined set of level 3 programmes. The Government's 2017 careers strategy⁵ laid the foundations for improvements to the quality of careers guidance. We are beginning to see the impact of these changes with improvements across every element of careers guidance, including 3 million young people now benefitting from regular employer encounters.

Level 3 landscape for 16 to 19 year olds

Question 13a: At level 3, what purposes should qualifications other than T Levels or A levels serve for 16 to 19 year olds?

Question 14a: How should we determine “overlap” in relation to overlaps with T Levels?

Question 14b: How should we determine “overlap” in relation to overlaps with A levels?

Summary of responses

39. When interpreting the responses to Question 13a, it should be noted a large number of respondents focused on the purposes that they felt level 3 qualifications actually serve, rather than the purpose they should serve in a future level 3 landscape.
40. The most commonly cited purpose, offered by 237 respondents (49% of those who provided a response to Question 13a) indicated that qualifications other than T levels and A levels provide an opportunity for progression into employment, further training, education or an apprenticeship. Additionally, 189 respondents (39% of those who provided a response to this question) also expressed concern about creating a binary

⁵ DfE (2017). [Careers strategy: making the most of everyone's skills and talents](#)'.

choice between T Levels and A levels, particularly for students who are uncertain about which route to follow at age 16.

41. Retaining Applied General qualifications (AGQs) would, in their opinion, provide a valuable third option for students who are not ready or did not want to pursue a T Level or A level. Additionally, 95 respondents highlighted the flexible learning and assessment methodology of AGQs which may suit different learning styles,
42. Respondents similarly indicated some students prefer to combine A levels and AGQs as they can simultaneously engage in both academic and vocational learning.
43. Respondents also highlighted the wide range of potential outcomes that qualifications might have. The often non-linear nature of student progression added to the difficulty of measuring purpose, with a small number⁶ specifically highlighting the occasional sideways progression of SEND students.

Determining overlap

44. A total of 419 respondents answered Question 14a. Of those, 275 did not provide a clear suggestion for how overlap might be determined in relation to T Levels. It was rare for a respondent to state a single indicator, instead listing multiple factors that should be considered such as purpose, target cohort, assessment methods, intended progression, technical content and size of qualification.
45. When discussing the importance of 'context' and 'purpose' it was suggested that a simple 'tick box' approach to assess overlapping content would lack rigour. For example, a qualification with similar content to a T Level but without an Industry Placement is fundamentally different and therefore maybe more suited to students who are not fully ready to undertake all elements of a T Level.
46. Furthermore, overlapping qualifications may be necessary, for example in localities where work placements for T Levels are difficult to arrange.
47. In relation to overlap with A levels, a total of 365 respondents provided comment. As with defining overlap with T Levels, respondents did not state one single indicator that should determine overlap but again highlighted the importance of context and purpose. Respondents suggested that as A levels offer an 'academic' route this should distinguish them sufficiently from many AGQs. Therefore, overlap of other level 3 qualifications with T Levels and A levels would be justifiable if the purpose were to open up a different pathway.
48. For some respondents, the process of determining overlap would require a review programme involving a range of stakeholders. Some respondents argued that without

⁶ The term 'small numbers of respondents' refers to fewer than 10 responses.

this, there was the risk of essential qualifications being removed and potential resulting skills gaps.

Government response

49. We acknowledge the concern shared by a large number of respondents to Question 13a that a binary choice between T Levels and A levels at level 3 may remove other options perceived as being more appropriate to the needs of young people who do not know what route to follow at age 16. We also acknowledge that our approach to determining overlap between T Levels, A levels and other level 3 qualifications should recognise the full range of factors that distinguish the intended purpose and features of a qualification and the context in which it is taken.
50. We do not believe that young people who are uncertain about which route to follow are well served by the current range of level 3 qualifications. We believe that all qualifications at level 3 should offer a clear line of sight to further study or employment, otherwise students are at risk of taking qualifications which do not offer meaningful progression opportunities. We want students to take qualifications that give them the best opportunities, and for most young people that means T Levels or A levels. As noted in paragraph 38 above, high quality IAG are vital in supporting young people to make the right choices.
51. We acknowledge however that T Levels and A levels will not cover all subject areas, skills and knowledge valued by employers and HE providers, and there will be a need for additional qualifications that can be taken alongside or instead of T Levels and A levels. Alongside T Levels, there will be a need for technical qualifications that attest to entry-level competence aligned to employer-led standards that are not covered by T Levels, including niche occupational areas. Similarly, there will be a need for specialist qualifications where there is a clear need for a specialist degree of occupational competence to secure employment in certain trades and industries.
52. The proposed approach to determining overlap with T Levels set out in the second stage consultation is based on this alignment with employer-led standards. As stated in paragraph 37 above, 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.
53. On the academic route, we acknowledge the support given by respondents to Questions 13a and 14b for study programmes combining AGQs and A levels. However, as both types of qualifications have a prime purpose of progression to HE we do not think that a system in which different types of qualifications claim to support progression to the same outcome sets a clear path for students who wish to pursue further study at higher levels. As set out in more detail in the *Level 3 qualifications for 16 to 19 year olds* chapter of our second stage consultation, we propose to remove

funding for qualifications that exist to offer an applied or alternative form of study in an A level subject area.

54. We recognise that for young people looking to progress into HE, A levels will not always be able to provide the breadth and depth of content required to progress to certain HE courses. As set out in more detail in the *Level 3 qualifications for 16 to 19 year olds* chapter of our second stage consultation, we propose to fund a small range of academic qualifications to be taken alongside or as an alternative to A levels where there is a clear need for skills and knowledge that A levels alone cannot deliver.
55. We acknowledge the concern shared by some respondents to Question 14a that removing qualifications that overlap with T levels may negatively impact students where the full T Level programme (including industry placement) is harder to deliver, for example in rural areas. We are committed to ensuring that no student should be prevented from undertaking an industry placement due to the additional costs they may face to take part - such as additional transport costs. For more detail regarding the support available to employers and providers to deliver industry placements, including route-specific information, please refer to the [T Level industry placements delivery guidance](#).

Ensuring qualifications are high quality

Question 10: Are the quality features listed the right starting point for framing future quality requirements for publicly funded qualifications?

Question 11: Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes, that should be given priority?

Summary of responses

56. 441 respondents answered Question 10, with 66% of these (289 respondents) answering yes.
57. A large proportion of the 289 respondents broadly agreed with the quality features listed with 'appropriate assessment', 'proven track record', 'minimum size' and 'employer involvement' the most commonly cited. It should be noted that while some respondents appeared to be interpreting 'appropriate assessment' as meaning 'rigorous' assessment, others interpreted the term as meaning that assessment should be flexible and relevant to the qualification, sector or industry.
58. Respondents stated the minimum external assessment levels of 40% appeared arbitrary. External assessment and examinations were often not appropriate for some students to demonstrate their learning. Adults, students with SEND or those with low prior attainment were specifically mentioned.

59. When referring to 'proven track record', concerns were raised about the need to generate 'volume' and that niche or specialist qualifications may struggle to reach the required threshold of 100 enrolments. Specialist qualifications may only be offered in small numbers by one provider but vital to an industry.
60. Where respondents provided clear detail for why 'minimum size' was problematic they viewed the number of guided learning hours as arbitrary and difficult to relate to different needs of students. It was felt that the size of a qualification is not an indicator of quality.
61. The importance of employer involvement was recognised as was the difficulty securing consistent employer involvement in some locations.
62. Very few respondents highlighted quality features that they felt should be de-prioritised.

Government response

63. All students have the right to access high quality qualifications. A levels and T Levels have already been subject / are currently subject to a reform programme to ensure that they are high-quality level 3 qualifications.
64. Ofqual has been working with AOs to strengthen its regulatory approach and secure greater assurance of validity and reliability of vocational and technical qualifications, initially focusing on those used in school and college accountability measures. However, we know that more needs to be done to ensure quality, and so a more substantial programme of reform is required for these qualifications. Therefore, we propose to work with Ofqual and the Institute to improve the quality of level 3 qualifications now and in the longer term.
65. Respondents highlighted the importance but also the difficulty of securing consistent employer involvement. That is why we are proposing that the Institute, as the organisation responsible for Technical Education and with strong links to employers through their route panels, should have the lead role in determining whether level 3 technical qualifications for 16 to 19 year olds and adults are good quality and meet employer needs.
66. We propose that in future, the significant majority of funded level 3 technical qualifications will need to align to an employer-led standard. Institute approval will be overseen by panels of employers which currently provide independent, occupational expertise in the approval of standards and T Level qualifications. We think this approach balances the need for consistent employer input, whilst ensuring a variety of employers are represented and retaining a degree of local flexibility.
67. We are proposing to:
- continue to fund alternative academic qualifications where there is a clear need for skills and knowledge that A levels alone cannot deliver; and

- improve the quality of post-16 alternative academic qualifications by working closely with Ofqual to strengthen its scrutiny and regulation of these qualifications. We will also make our criteria for funding approval more robust.

68. We think this approach most effectively balances our objectives of raising quality in a proportionate way, whilst delivering timely improvements, and not exceeding the system's capacity. Please find more detail regarding our proposals in the *Ensuring qualifications are high quality* chapter of the [second stage consultation](#).

69. Subject to the outcome of the second stage consultation response, we will consider the responses to this question as we work with Ofqual and the Institute to finalise proposals and agree the specific criteria.

Supporting adults

Question 12: Are there particular quality principles that we should consider for adults?

Question 13b: At level 3, what purposes should qualifications other than T Levels or A levels serve for adults?

Summary of responses

70. Of the 395 respondents who answered Question 12, the majority suggested the requirement for flexible or modular programmes so they could be tailored to fit around work and family commitments.

71. When determining the purpose qualifications other than T Levels or A levels serve, respondents stated qualifications should provide the opportunity for an adult to enter employment, further training, or education. It was also generally felt the removal of qualifications that overlap with T Levels and A levels would limit progression opportunities for adults.

72. In response to Question 13b a small number of respondents differentiated between the 'types' of adults suggesting they have differing needs depending on the stage of their working life.

Government response

73. In our first stage consultation we acknowledged that a "one size fits all" approach to the qualifications landscape would be unlikely to meet the needs of all adults, who represent a highly diverse cohort comprising a wide range of different needs and levels of prior experience. We therefore share the view that qualifications should offer the flexibility adults need to undertake study alongside other responsibilities, particularly adults looking to upskill.

74. That is why in our second stage consultation (as set out in the *Supporting adults* chapter) we are proposing three core design principles that all level 3 technical qualifications for adults must adhere to:

- Modular delivery of content.
- Recognition of prior learning; and
- Competence-based assessment.

75. We acknowledge concerns raised by respondents to Question 13b about the removal of level 3 qualifications that overlap with T Levels and A levels and how this would affect adults engaging in level 3 study. In particular, we recognise that the approach we propose to take to T Level overlap for 16 to 19 year olds would be unlikely to work for all adults, particularly those who do not want or cannot commit to a full two-year T Level.

76. As set out in the *Supporting Adults* chapter of our second stage consultation, we propose that adults should have access to the same range of level 3 technical qualifications that will be available to 16 to 19 year olds (including T Levels), but with the addition of technical qualifications that provide entry-level competence in occupations that are also covered by T Levels. To be funded for adults, these qualifications must adhere to our design principles as set out above and in more detail in our second stage consultation.

77. For adults studying academic qualifications at level 3, we propose that the same range of qualifications that will be available to 16 to 19 year olds should extend to adults. We also recognise the important role Access to HE diplomas play in supporting adults (including those without traditional qualifications) to upskill, and to progress into higher education.

78. More detail on our proposals for approving the quality of these qualifications can be found in the *Ensuring qualifications are high quality* chapter in the consultation.

79. Level 2 and below study also plays an important role for adults and we intend to explore this in more detail through our call for evidence.

Personal, social and employability qualifications

Question 7: Are standalone qualifications in personal, social and employability skills necessary?

Summary of responses

80. 52% of respondents indicated that standalone qualifications in personal, social and employability skills were necessary. However, when referring to these qualifications

the majority of respondents did not distinguish between ‘personal and social’ and ‘employability’ related qualifications, and often referred to them as ‘transferable’ skills.

81. At level 3 there was strong support for developing personal, social and employability skills through the delivery of a robust personal, social, health and economic (PSHE) curriculum rather than the need for individual qualifications.
82. At level 2 and below there were mixed views on their currency as standalone qualifications. Some suggested standalone qualifications played a role in supporting the achievement, progression, employability, and personal and social development of a range of students, in particular SEND students and those studying at level 1 and below. Others indicated that these types of qualifications were not necessary as the skills should be embedded within the wider curriculum.
83. 44 respondents (16%) stated that standalone qualifications are needed to meet the specific needs of adults and some respondents indicated they could be valuable for students who are, or are at risk of becoming, Not in Employment Education or Training (NEET).

Government response

84. At level 2 and below, there were mixed views on the value of these qualifications, particularly in relation to students at level 1 and entry level, and those with SEND. It was clear that the skills are important, but it was unclear if these skills are always best delivered through a qualification. We intend to use the call for evidence to explore how providers define good outcomes for students studying at level 1 and entry level, and the most effective provision in delivering them. We will use the responses to shape the future position of these qualifications.
85. By comparison there was less support for standalone personal, social and employability qualifications at level 3. We recognise however the important role played by the PSHE curriculum for delivery of these skills for 16 to 19 year olds. As part of a 16 to 19 study programme all students are currently expected to take part in meaningful non-qualification activity alongside work experience, including for example activities to develop confidence, character, and resilience.⁷

⁷ DfE (2020). [‘16 to 19 study programmes: guidance \(2019 to 2020 academic year\)’](#).

Supporting progression to level 3

Question 15: How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?

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

Summary of responses

86. The most frequently cited suggestion stated by 121 respondents to Question 15 and 130 respondents to Question 16 was that progression to level 3 from key stage 4 could be best supported by maintaining a wide range of post-16 qualifications. This included maintaining a range of options so that students might combine different types of qualifications.

87. Other themes included:

- high quality careers advice and guidance, to ensure that students, teachers and parents, are clear on the options available.
- greater coherence and articulation between level 2 and level 3 qualifications to ensure continuity and clear progression routes between levels.
- the importance of flexible and varied assessment methods suited to the needs of different students; and
- additional support for students transitioning from key stage 4 but who are not yet ready to progress to level 3 study.

Government response

88. As we set out in the first stage consultation, there are clear benefits to students achieving at level 3, particularly those who achieve a full level 3 (equivalent to 2 A levels), who will on average benefit from a 9% wage premium⁸.

89. We want as many students as possible to be on a clearly defined route to achieve level 3, but there will be some students who face barriers which mean they are not ready to start a level 3 programme immediately. We want to ensure the programmes and qualifications available meet the needs of these students.

⁸ BIS (2015) 'Measuring the Net Present Value of Further Education in England - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/435166/bis_15_323_Measuring_the_Net_Present_Value_of_Further_Education_in_England.pdf

90. We have already introduced the [T Level Transition Programme](#), phased in from September 2020, for students who want to do a T Level and have the potential to progress onto one following a tailored preparatory programme.
91. We think it is helpful to explore in more detail what other types of provision would best support students who face barriers to starting a level 3 programme immediately but who do not plan to take a T Level. For instance, it may be that a preparatory year of study through a new form of transition would help these students overcome barriers to progression and we intend to explore this through our call for evidence. We will explore this through the level 2 and below call for evidence, to be published shortly.

Level 2 and below

Question 17: If level 2 qualifications are intended to lead directly to employment, what quality principles should apply?

Question 18: What are the key roles that qualifications at level 1 and below need to play?

Question 19: Are there additional principles we should apply to level 1 and below?

Summary of responses

Level 2 leading to employment

92. A total of 412 respondents (77%) provided a response to Question 17. The majority of whom suggested qualifications at level 2 should adequately prepare the student for employment, with 'employability skills' the most frequently cited quality principle. Similarly, 'literacy and numeracy' was often discussed in relation to student preparedness for the workplace.
93. Respondents said that level 2 was a common entry point into employment across a number of sectors or industries, including hairdressing, construction and land-based industries. For these sectors, it was imperative that qualifications meet industry requirements for entry to the workplace and are endorsed by employers. They should also be flexible to meet local skills needs, align to industry standards, and adequately prepare students for employment.
94. Related to this was the suggestion that if level 2 qualifications are intended to lead directly to employment, then they should develop skills that make a student 'workplace ready' rather than simply providing students with theoretical knowledge. Respondents said any assessment must be appropriate to the knowledge and skills needed by employer.

95. In contrast, a small number of responses stated that employment should not be the primary purpose of level 2 qualifications.

Level 1 and below

96. There was a general theme that qualifications at level 1 and below should broaden a student's vocational skills and knowledge in addition to developing literacy and numeracy skills.

97. Qualifications should be motivating, engaging and offer a sense of achievement, inspiring students to continue and progress with their learning or to participate in employment opportunities. For some students, attainment at this level may be the first time they have achieved a qualification and the positive impact on their confidence and potential to progress should not be underestimated.

98. A common theme among respondents who stated that level 1 qualifications can play a motivational role for students was that this was particularly the case for SEND students, and other students from groups who might be less likely to engage with education and training opportunities. The importance of flexible and varied assessment methods, suited to the needs of different students, was highlighted, often including suggestions for the careful or limited use of examinations.

Government response

99. We want to gather more evidence on the full range of issues at level 2 and below before we bring forward firm proposals for reform. Because of this and the fact that we are transforming the level 3 landscape, we intend to publish a call for evidence. The consultation highlighted a range of issues and in particular the need to understand how level 2 helps people access quality employment. We also believe it is important to better understand how level 2 supports progression to level 3.

100. Through the call for evidence we intend to further explore level 1 and entry level study for 16 to 19 year olds as well as adults. For 16 to 19 year olds, we want to see students who start at these levels following coherent pathways through study programmes that are engaging and deliver the skills they need. We also intend to explore level 1 and entry level study for adults, and the circumstances in which qualifications are most valuable.

Pre-existing qualifications

Question 20: 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?

101. In the first stage consultation, we outlined our intention to secure early progress where possible. Since publication we have confirmed the removal of public funding from 163 pre-existing qualifications, therefore this response is included for completeness.

Summary of responses

102. A total of 256 respondents stated 'yes' to Question 20 with the majority highlighting the broad impact of proposed reforms to post-16 education, rather than raising specific 'equality' impacts or specific impacts of withdrawing funding from 'pre-existing' qualifications.

103. Negative impacts focused on:

- the 'reduction of student choice' and a decline in the availability of AGQs, and other vocational or technical qualifications, would disadvantage students who may not perform well in formal examinations;
- the proposed pace of change was too rapid for the sector to accommodate;
- the sustainability and viability of smaller and /or specialist AOs; and
- increased teacher workload, or the potential loss of staff if the number of qualifications and/or students declines.

104. Respondents also raised a potential issue in withdrawing suites of pre-existing qualifications where smaller qualifications were 'nested' within larger qualifications and students would no longer have the facility to 'top up'.

Government response

105. In the first stage consultation, we stated the Department's decision to remove funding approval from pre-existing level 3 qualifications that had been mapped to a redeveloped qualification and approved for inclusion in 2020 performance tables. Respondents did not raise any significant additional impacts that should be considered. The full list of qualifications from which funding approval was removed as of 1 August 2020 is available [here](#).

106. Through responses to the consultation, we found that some pre-existing qualifications are part of a suite of qualifications, where a smaller qualification is 'nested' within a larger qualification. To ensure no student was disadvantaged we worked with our stakeholders to develop an operational solution, details of which can be found [here](#).

Additional impacts to be considered, including equalities impacts

Question 25: 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?

Question 26: Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation?

Summary of responses

107. A total of 257 respondents provided a clear response to Question 25, broadly discussing the potential negative impacts for disadvantaged students, those with SEND and other student groups (including looked after children, students with English as an additional language, and students in rural areas).
108. One common reason cited by respondents was that any withdrawal of AGQs would result in a reduction in the ability of some students to access education and training opportunities, which could result in a decline in participation. There was also a common concern that student choice would be impacted, reducing the ability of students to participate in the qualifications and programmes that are best suited to them.
109. In addition, 50 respondents (19%) highlighted broad negative impacts for students or communities in general. Concerns included the potential impact on students who live in coastal or rural areas who may need to travel further to access particular qualifications, which could impact those from poorer backgrounds. There was a particular concern that SEND students may not be able to find appropriate T Level placements.
110. A further 30 respondents suggested the removal of AQGs would have a disproportionately negative impact on Black and Minority Ethnic (BAME) students as they were more likely to progress to University with AGQs than their white counterparts.
111. Of the 385 respondents who answered Question 26, 72% answered 'Yes'. A total of 171 respondents provided a clear answer that addressed Question 26 and the most common response was that we should include the impact on people's ability to access suitable education and learning opportunities.
112. Thirty-one respondents (18%), the majority of whom were providers, also stated that the financial impacts of reforms on providers should be explored. This finding was influenced by one almost identical 'campaign', which accounted for 17 of these responses.

Government response

113. We acknowledge the concerns raised around the potential negative impacts for disadvantaged students, SEND students, and other vulnerable groups including those from BAME backgrounds. As highlighted in the [impact assessment](#), students from Asian and black ethnic backgrounds, are more likely to be affected by the proposals, as they are strongly represented on qualifications that we expect will no longer be available in the future level 3 landscape.
114. It is vital that the right support is put in place for these students and we are exploring mitigations that will enable them to achieve their potential. For those that do go on to achieve at level 3, our reforms will mean that they will be able to have more confidence that the qualifications they take will lead to positive outcomes aligned with their career and learning aims.
115. Some students will need more time to achieve a level 3 qualification as a result of these reforms. We are already introducing the [T Level Transition Programme](#), phased in from September 2020, for students who have the potential to progress to a T Level following a tailored preparatory programme. In addition, we intend to explore effective practice in supporting progression to level 3 and what new programmes may be needed at level 2, including new potential forms of transition support, through our forthcoming call for evidence.
116. Some students will leave education with level 2 as their highest achievement. Through the level 2 and below call for evidence we intend to seek evidence on how to ensure that qualifications and programmes at level 2 and below support good employment opportunities.
117. It is also vital that qualifications in the new landscape meet accessibility requirements for SEND students. Therefore, we are determined that this review will have a positive effect on disadvantaged students, those with SEND, and other vulnerable groups, by making sure every available option is a good one and that each qualification supports progression. We ask for further comments about the additional support SEND students might need to achieve the new high quality offer at level 3 through the second stage consultation.
118. We would also like to explore further whether there are specific level 3 qualifications particularly valued by SEND students and any risks associated with removing public funding from these qualifications. The second stage consultation sets out how we will make sure the review of level 3 qualifications works for those with special educational needs and disabilities and provides further detail on how T Levels have been made accessible for SEND students.

Additional data to be considered

Question 8: 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?

Question 9: How could we better use data about student outcomes to monitor and assess the success?

Summary of responses

119. There was a significant level of overlap between the 487 responses to Question 8 and the 444 responses to Question 9.

120. Whilst there was a general acceptance that the types of evidence and data outlined in the consultation document provide a reasonable basis for assessing successful outcomes, a wide range of additional suggestions were made. These suggestions fell into three broad categories:

- ‘Context based’ responses focused on the importance of considering data related to the characteristics of students or the broader social context. Specifically, the level of deprivation or disadvantage experienced by students.
- A range of ‘outcomes indicator focused’ evidence or data was suggested by respondents, including retention rates, wage returns and whether students eventually worked in sectors related to their qualifications.
- ‘Methodologically focused’ data or evidence suggestions included greater use of longitudinal tracking and student surveys.

121. Seventeen respondents challenged the basis of Question 8, typically stating that qualifications should not be judged based on students’ progression to specific outcomes. The lack of clarity around the specific definition of ‘outcomes’ made it difficult to assess how these might best be measured.

Government response

122. We welcome the suggestions and where the additional data has been available, it has been referred to when assessing the impact of our proposals on the level 3 landscape. As referenced in the [second stage consultation](#) and accompanying impact assessment, we expect a reformed level 3 landscape to look quite different. Therefore, it has not been possible to provide a fully quantified assessment of the impacts using outcome and longitudinal data.

123. We will continue to consider evidence and responses to the second stage consultation and the upcoming level 2 and below call for evidence to help inform policy development and will update our impact assessments accordingly.

Annex A: List of consultation questions

Question	Location in this Government response
Questions 1 – 5 includes respondents' personal information for example name, email address, organisation.	N/A
Question 6: 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.	Purpose of qualifications.
Question 7: Are standalone qualifications in personal, social and employability skills necessary?	Personal, social and employability qualifications.
Question 8: 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?	Additional data to be considered.
Question 9: How could we better use data about student outcomes to monitor and assess the success?	Additional data to be considered.
Question 10: Are the quality features listed the right starting point for framing future quality requirements for publicly funded qualifications?	Ensuring qualifications are high quality.
Question 11: Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes, that should be given priority?	Ensuring qualifications are high quality.
Question 12: Are there particular quality principles that we should consider for adults?	Supporting adults.

Question	Location in this Government response
Question 13a: At level 3, what purposes should qualifications other than T Levels or A levels serve for 16 to 19 year olds?	Level 3 landscape for 16 to 19 year olds.
Question 13b: At level 3, what purposes should qualifications other than T Levels or A levels serve for adults	Supporting adults.
Question 14a: How should we determine “overlap” in relation to overlaps with T Levels?	Level 3 landscape for 16 to 19 year olds.
Question 14b: How should we determine “overlap” in relation to overlaps with A levels?	Level 3 landscape for 16 to 19 year olds.
Question 15: How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?	Supporting progression to level 3.
Question 16: How could post-16 qualification reform and broader study best support more people to achieve at level 3?	Supporting progression to level 3.
Question 17: If level 2 qualifications are intended to lead directly to employment, what quality principles should apply?	Level 2 and below.
Question 18: What are the key roles that qualifications at level 1 and below need to play?	Level 2 and below.
Question 19: Are there additional principles we should apply to level 1 and below?	Level 2 and below.
Question 20: Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact	Pre-existing qualifications.

Question	Location in this Government response
assessment published alongside this consultation?	
Question 21; Do you agree with the proposed criteria for identifying qualifications with no enrolments?	Low and no enrolments: Response to the first stage consultation on the review of post-16 qualifications at level 3 and below in England published 13 February 2020.
Question 22: Are there specific reasons that a qualification with no enrolments should remain approved for funding?	Low and no enrolments: Response to the first stage consultation on the review of post-16 qualifications at level 3 and below in England published 13 February 2020.
Question 23: Do you agree we should consider removing approval for funding from qualifications with low enrolments?	Low and no enrolments: Response to the first stage consultation on the review of post-16 qualifications at level 3 and below in England published 13 February 2020.
Question 24: Are there specific reasons that a qualification with low enrolments should remain approved for funding?	Low and no enrolments: Response to the first stage consultation on the review of post-16 qualifications at level 3 and below in England published 13 February 2020.
Question 25: 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?	Additional impacts to be considered, including equalities impacts.
Question 26: Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation?	Additional impacts to be considered, including equalities impacts.



Department
for Education

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