



**Rt Hon Nadhim Zahawi MP**  
Secretary of State

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Dr Jo Saxton  
Ofqual Chief Regulator  
by email: [Jo.Saxton@ofqual.gov.uk](mailto:Jo.Saxton@ofqual.gov.uk)

February 2022

Dear Jo

In July 2021, we published the Government's response to our public consultation on the Review of Post-16 Qualifications at level 3 in England. I am writing to you now to set out my further steers on the development of the qualifications I believe we require to make up the funded landscape at level 3 for post-16 students.

As you know, A levels and new T Levels are our flagship level 3 qualifications for 16 to 19 year olds. A levels are purely academic qualifications which seek to support students to progress to undergraduate academic study, particularly (although not only) in the same subject area, while T Level technical qualifications are based on occupational standards and their primary purpose is to support entry to skilled employment, either directly or following a period of higher technical education.

Our reforms will simplify the current system, ensuring that all qualifications alongside A levels and T Levels are fit for purpose, are high-quality and lead to good outcomes. In particular, we intend the future landscape: i) to be clearer to navigate for students and other users of qualifications; ii) to be populated by high-quality provision for which there is a clear necessity; and iii) to ensure students are better equipped to progress to their intended destinations. To bring about these aims, I have decided that the provision at this level must be strengthened in comparison to the approaches currently in place. I set out further below my expectations in this regard.

A fundamental feature of our proposals is there being an improved level of clarity about the purpose of qualifications and their intended destination points for students. In particular, this relates to whether a qualification is intended primarily to support progression to further academic study or into skilled employment. As such, I address these parts of the landscape in turn.

### *Alternative academic qualifications*

Government policy is to ensure there is a meaningful offer of high-quality academic qualifications that can be taken alongside or as alternatives to A levels where there is a clear need for the skills and knowledge they contain to support progression to higher education. These qualifications – which might be similar to those termed ‘Applied Generals’ in the current landscape – will need to prepare students well for future study; particularly with respect to high-quality higher education. To achieve this purpose, I believe that these qualifications must incorporate a significant assessment of knowledge and understanding, but with an emphasis also on the ability to apply this in various contexts.

As set out in the consultation response, it will be important that the necessity of these qualifications can be demonstrated. In that regard, I would view them as comprising two broad categories. The first are qualifications with an emphasis on practical or applied knowledge and skills that – when taken with A levels – would complement A level study and thereby support progression to an aligned subject area at higher education. The second are qualifications in subject areas with high levels of practical or performance-based content that is not available through A levels. These may be larger qualifications (equivalent in size to a student’s full study programme, providing there is not overlap with T Levels) owing to the need to develop the requisite skills and knowledge to enable progression to aligned areas of higher education.

I would like Ofqual to consider how it can help ensure the quality and consistency of this part of the future landscape, and how its range of regulatory powers can most appropriately be deployed to realise this aim.

Any qualifications taken alongside or instead of A levels must be high quality level 3 qualifications. This does not mean they must look exactly like A levels – I recognise that variations and flexibilities in approach are important and these qualifications must offer genuine alternatives to students. As such, I am content that existing approaches to qualification design and delivery proceed where these have particular benefits for students and their centres. However, improving quality within this is also key, as are the overall aims of these reforms, and I would encourage you to consider carefully the mitigation of attendant risks.

To date, there has been a separation between those qualifications that attract public funding and those qualifications that can count in performance tables. In recent years, the Department has published requirements that qualifications must meet in order to feature on performance tables but it has not been necessary for qualifications to meet these requirements to be eligible for public funding – leading to two separate categories of qualifications, those with funding and those also counting in performance tables. My intention going forward is to minimise these differences in relation to the majority of qualifications, so that most meet the requirements to count in performance tables. This approach may mean that the Department publishes minimal separate performance table requirements in the future landscape. You should, therefore, consider the potential for eligibility to count in performance tables as an important purpose of these qualifications when considering your approach to their regulation.

Linked to this, I recognise the work that Ofqual has performed to date around investigating the issues with the maintenance of standards in existing ‘Applied General’ and ‘Tech Level’ qualifications. I would like you to explore further how best to secure grading standards, over time and between awarding organisations, in these academic qualifications going forward.

#### *Alternative technical qualifications*

In this context, alternative technical qualifications are those non-T Level technical qualifications that have the primary purpose of identifying students that have attained the knowledge, skills and behaviours that represent competence in a given occupation. The alignment of these qualifications to occupational standards set by employers through the Institute for Apprenticeships and Technical Education represents a significant step in improving their quality. The level of change to existing provision that alignment to occupational standards will represent may in some cases be considerable, but in my view is necessary to ensure that these qualifications provide effective progression for students.

T Levels will be the primary technical offer for 16 to 19 year olds. The consultation response set out the types of alternative technical qualification we intend to fund for 16 to 19 year olds alongside T Levels, and the types of alternative technical qualification we intend to fund for adults.

I would like Ofqual to consider its role in helping further ensure the quality of these alternative technical qualifications. Particularly important in this context will be how Ofqual and the Institute continue to work together. The Skills and Post-16 Education Bill sets out expectations in this regard, consolidating the approaches you have been taking successfully to date in developing the overarching framework for assurance of technical qualifications, with each organisation drawing on its unique expertise and powers, so that employers and students are rightly at the heart of the qualifications landscape.

Current technical qualifications have a diverse range of approaches to specifying content, assessment and grading students. Some diversity is likely to be necessary into the future to ensure that these alternative technical qualifications meet the needs of employers, students and centres. I would like you to consider how the diverse needs of students, employers and centres can be accommodated through your regulatory approach, while also supporting the aim for high-quality qualifications. With that in mind, I would be satisfied that elements of modular assessment continue to be allowed to exist in alternative technical qualifications where this is necessary and appropriate, and that this does not compromise the demonstration of occupational competence. The emphasis should be on qualification methodologies delivering effectively against their clearly-stated purposes, which in this context would be assessment of occupational competence against employer-led standards.

### *Conclusion*

I am wholly mindful of the ambitious nature of this programme, and of the demanding context as the sector deals with the impacts of the Covid-19 pandemic. My desire is for these changes to reflect a meaningful improvement in the quality of these qualifications, ensuring students receive the best possible preparation whether they are progressing to higher education or into skilled employment.

In parallel we must take due account of the disruption and uncertainty that may arise for schools and colleges throughout this process, particularly as we build to the first introduction of reformed qualifications from 2024/25. Providers have seen a number of changes to the qualifications they deliver in recent years and it is important that we maintain the balance between those critical imperatives of improving quality and minimising disruption as we take forward these vital reforms.

Finally, I would like to thank you and your officials for your continued engagement with my Department. This is a once in a generation opportunity to develop a qualifications system that benefits all students, and I look forward to continuing to work together as we implement these important changes.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Zahawi'. The signature is fluid and cursive, with a large loop at the end of the name.

**Rt Hon Nadhim Zahawi MP**  
**Secretary of State for Education**