



Department
for Education

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

Government consultation

Launch date 19 March 2019

Respond by 10 June 2019

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Foreword by the Minister of State for Apprenticeships and Skills



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. Whether you want a career in engineering, construction, music or creative design, there should be high quality qualifications available that employers recognise and trust. This is important to the life chances and wellbeing of individuals and their families. It is crucial to the competitiveness and economic prosperity of the country as a whole.

Our education reforms in England, the most ambitious for generations, have already done much to strengthen the quality and rigour of our core academic qualifications (A Levels and GCSEs). But despite some notable progress, our technical education system as a whole has not, until recent years, received the sustained attention it deserves. For too long, students not taking A Levels have had to contend with a qualifications landscape where qualifications are far from consistent in terms of quality and where it has not been clear which qualifications will lead to good outcomes.

To address these issues, the government confirmed in its [Post-16 Skills Plan](#) its commitment to fundamental reform. T Levels are the centrepiece of our plans: rigorous, stretching programmes of study at level 3 based on recognised, employer-led standards. They will offer, for the first time, a high quality, prestigious technical alternative to A Levels and be aligned with work-based technical education also delivered at level 3 through apprenticeships.

These reforms will only be successful if we answer fundamental questions about the wider post-16 qualification system, including about the qualifications that are needed and the ways in which their quality can be assured. The resulting changes will be part of the biggest change to technical education in a generation and we recognise that education providers, awarding organisations, students, employers, and others across the sector will need time to prepare and adjust.

The aim of this review is to streamline qualifications for students post-16, ensuring that we only fund those that are high quality, have a distinct purpose, are truly necessary and support progression to successful outcomes. There are many things that students and providers value about the current system so we want to understand the impact that changes might have on the sector. We have a clear vision but open minds, which is why this review is happening in two stages.

However, where it is possible to take action to improve quality more quickly, we will do so. This consultation sets out actions and proposals to achieve this. We also welcome measures being set in train by Ofqual, the independent qualifications regulator, to strengthen assessment and moderation processes.

This review forms part of a much broader set of educational reforms that aim to create a coherent system with clear, high quality progression routes for students of all ages. They include the National Retraining Scheme, the Review of Post-18 Education and Funding and the Review of Higher Technical Education. This review will support these reforms, building a high quality and responsive qualifications system for years to come.

A handwritten signature in blue ink that reads "Anne Milton". The signature is written in a cursive style with a large initial 'A' and a distinct 'M'.

The Rt Hon Anne Milton MP

Minister of State for Apprenticeships and Skills

About this consultation

Who this is for

The consultation is for anyone with an interest in post-16 education and training for young people and adults in England. This includes:

- Students (young people 16 to 19 and adults 19 and over)
- Parents and carers
- Employers
- Awarding organisations
- Schools, further education colleges, sixth form colleges, University Technical Colleges, Studio Schools
- Universities and other higher education providers
- Adult and Community Learning providers
- Independent training providers
- Apprenticeship providers
- Headteachers and college principals
- Teachers and trainers
- Careers advisers
- Regulatory bodies
- Equality organisations, including those representing the interests of students with special educational needs
- Local, regional, city and combined authorities and the devolved administrations in Scotland, Wales and Northern Ireland
- Representative bodies, including employers' representative bodies and trade unions
- Governors of Education and Skills providers
- Local Enterprise Partnerships

Issue date

The consultation was issued on 19 March 2019

Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team on:

By email: Post16Level3andBelowReview.CONULTATION@education.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by

- email: Coordinator.CONULTATIONS@education.gov.uk
- telephone: 0370 000 2288
- the [DfE Contact us page](#)

Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

The response

The results of the consultation and the Department's response will be [published on GOV.UK](#) later in 2019.

Respond online

To help us analyse the responses please use the online system wherever possible. Visit www.education.gov.uk/consultations to submit your response.

Other ways to respond

If for exceptional reasons you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may contact us to request a Word document version of the form and email it or post it.

By email

Post16Level3andBelowReview.CONULTATION@education.gov.uk

By post

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Deadline

The consultation closes on 10 June 2019

Introduction and summary of proposals

1. In May 2018, in response to the public consultation on the implementation of T Level programmes¹, the government confirmed its plans to review post-16 qualifications that are approved for teaching in providers in England at level 3 and below. The review aims to streamline the number of qualifications available and to ensure, as T Levels develop, that we only fund high quality qualifications that serve a clear and distinct purpose. We expect, as a result of the review, that there will be far fewer qualifications at these levels approved for funding post-16 than is the case at present.
2. There is a compelling case for reform. As described in more detail in the case for change document published alongside this consultation², the current qualification landscape at level 3 and below is complex, comprising some 12,100 qualifications³ of varying types, sizes and design features. Some of the qualifications are well recognised and valued, reflecting the expert work that goes into them. But as the Wolf and Sainsbury reviews identified⁴, too many are poor quality and poorly understood, weakening their currency and value for individuals, employers and the economy as whole. In too many cases, the links to the world of work and skill needs in the labour market are weak.
3. Routes into and through post-16 education are also unclear, creating an unnecessary barrier both to young people choosing a technical route at age 16 and to adults looking to progress and build on their skills during their working lives. Recent reforms, such as the introduction of new criteria for post-16 performance tables, have only been partially successful in raising standards. More fundamental reform is needed if we are to secure a robust and effective system for the long term.
4. We want to use this initial consultation to gather views and evidence about the general principles that should apply to post-16 qualifications. We recognise that a 'one size fits all' approach will not work, particularly in relation to adults and students with additional needs including special educational needs and disabilities (SEND). We will explore these issues as part of our consultation, including the role of qualifications in helping them progress to positive destinations. For ease of

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.

² DfE (2019). '[Review of post-16 qualifications at level 3 and below in England: the current system and the case for change](#)'.

³ ESFA list of qualifications available for funding 16 to 19 as of July 2018.

⁴ Sainsbury and others (2016). '[Report of the Independent Panel on Technical Education](#)'; Wolf (2011). '[Review of Vocational Education – the Wolf Report](#)'.

reference, a list of the questions contained in this first stage consultation is provided at [Annex A](#).

Our principles for the system

5. To develop a more streamlined, simplified and ambitious technical qualifications system, we want all post-16 qualifications that we approve for public funding in future to follow our key principles of quality, purpose, necessity and progression. This consultation invites views on these principles and the way they will be applied to post-16 qualifications.
6. We want to understand where we can do more to give students clearer choices based on their career aspirations. Even where the intended purpose of a qualification is clear, qualifications must be necessary, meeting a defined educational or skills need in the system. We want to consider how best to ensure that these needs are built into the design of qualifications.
7. Every qualification at level 3 and below should provide for progression, offering a clear line of sight to higher levels of study, technical excellence and/or high quality employment.
8. We recognise that what constitutes quality will depend on the role that a qualification is designed to play. To be good quality, the content, design and size of the qualification must align with and support the qualification's purpose. Qualifications must deliver well on their intended outcomes.
9. We want T Levels and A Levels to become the qualifications of choice for 16 to 19 year olds taking level 3 classroom based qualifications. In applying our principles, we propose that qualifications that overlap with T Levels or A Levels should not be approved for public funding for 16 to 19 year olds. We will consider how the principles should apply to adults, reflecting their differing circumstances.
10. Post-16 qualifications below level 3 must have a strong focus on progression to higher levels of study, as part of our ambition to see more people achieve at level 3. For a small number of students, entering employment with qualifications below level 3 is a good outcome. Study below level 3 needs to give students the skills that give them access to a range of careers, and support them to re-engage with training or further education at a later point.

Securing early progress

11. Currently at level 3, older versions of Applied General qualifications and Tech Levels are taught alongside newer versions that have been designed to meet performance table criteria. As set out in the T Level Action Plan⁵, the Department has decided to withdraw approval for funding for the older versions of these qualifications. We will withdraw approval for funding for new starts on older versions from 1 August 2020.
12. We also propose to withdraw approval for funding for qualifications approved for students post-16 with either no or low enrolments. The proposed criteria for identifying these qualifications are set out at paragraphs 98 and 100 respectively.

Regulation

13. We have not made any decisions about the ongoing regulation of the new system. We believe that improving the quality of qualifications and maintaining their quality and relevance over the longer term will require regulatory change and will take time. The new system will need to be appropriate, proportionate and tailored to the outcome of the review.
14. We will work closely with Ofqual and the Institute for Apprenticeships and Technical Education (the Institute) to develop proposals that will become part of a second stage consultation later this year⁶.

Shaping the next stages of the review

15. This consultation marks the first stage of the review. The second consultation will build on the responses from the first stage and set out our more detailed proposals for change, including the criteria for removing approval for funding and any supporting regulatory change. Details on our planned process and timing are set out on pages 34 and 35.

Scope of the Review

16. This review covers the qualifications at entry level, level 1, level 2 and level 3 that are approved for funding for providers in England for their students aged 16 and over. We refer to qualifications at these levels as 'level 3 and below' and to the students taking them as 'post-16'. 'Young people' are 16 to 19 year olds, and 'adults'

⁵ DfE (2018). [T Level Action Plan](#).

⁶ Ofqual (2019), [Moderation and verification of centre assessment judgements](#).

are those aged 19 and over. Collectively, we refer to them as ‘students’. Qualifications included in ‘16 to 18 performance tables’ refers to qualifications approved for funding for students aged 16 to 19.

17. We will not be making any further changes to GCSEs, AS Levels and A Levels through this review⁷. We will also not be making changes to the qualifications that have recently been subject to, or are undergoing, development or reform:

- T Levels, which will be introduced from September 2020.
- English and mathematics Functional Skills qualifications (level 2 and below). New content and regulatory arrangements for English and mathematics Functional Skills were published last summer, ahead of first teaching in September 2019⁸.
- The new basic digital skills qualifications (entry level and level 1), to be introduced from August 2020⁹.

18. The remaining qualifications approved for funding for post-16 at level 3 and below cover a broad and diverse range of subject sector areas, serving academic and technical purposes. We do not propose to exclude any further qualifications from scope at this stage.

19. Currently, qualifications approved for public funding at level 3 and below are subject to different processes and criteria depending on the age group and funding source – see more detail at [Annex B](#)¹⁰. We want to use this first stage consultation to gather views and evidence about the general principles that should apply to qualifications irrespective of the age group at which they are targeted.

20. However, we also recognise that a ‘one size fits all’ approach will not work, particularly in relation to adults, due to:

- The diversity of the adult cohort – including those who may be re-engaging with education after a period of time away or are studying alongside employment or other responsibilities. This diversity of experience may affect

⁷ As confirmed in the government’s response to the T Level consultation. DfE (2018). [‘Implementation of T Level programmes consultation response’](#).

⁸ For more information, see Ofqual (2018), [‘Functional Skills Qualification Requirements’](#).

⁹ As set out in the basic digital skills consultation (October 2018 to January 2019), we are reforming basic digital skills and introducing a digital entitlement offer for adults. The offer will include reformed Digital Functional Skills qualifications from 2021, and other improved basic digital skills qualifications based on new national standards from 2020. For further information, see DfE (2018), [‘Improving adult basic digital skills’](#).

¹⁰ This includes the ESFA list of qualifications approved for funding 16 to 19, the local flexibility offer, the level 2 and level 3 legal entitlement qualification list, the English and mathematics legal entitlement qualifications list, Advanced Learner Loans qualifications.

the way someone wishes to access a qualification, and also its purpose. For example, some qualifications might have a stronger emphasis on confidence building or be focused on new skills required for changing job roles.

- Other developing policies and reviews affecting adults – including the National Retraining Scheme, the Review of Higher Technical Education (level 4 and 5 qualifications), the Review of Post-18 Education, and the devolution of the adult education budget (AEB).
- Access to T Levels – young people aged 16 to 19 will be the first to take T Levels and we need to make sure there is sufficient high quality provision for adults where T Levels are not available.

21. We will consider responses to this consultation and outputs from the other reviews and policy developments to determine how best to implement any changes for adults. We may propose to implement changes to the 16 to 19 funded qualifications list first and take a more staged approach to the adult qualifications lists. Throughout the review, we will carefully consider how changes to level 3 provision for 16 to 19 year olds may affect any future range of qualifications available for those aged 19 and over.

22. While our focus is on qualifications, we need to consider them in the context of the wider system. We would welcome respondents specifying where their views relate to qualifications, or broader study, such as study programmes for 16 to 19 year olds¹¹.

Non-GCSE qualifications at key stage 4

23. In the T Level consultation response, we also said we would review the use of non-GCSE qualifications taken by students aged 14 to 16 at key stage 4 and consult on the principles guiding that review.

24. We have looked further at the issues and have concluded that although the qualifications at key stage 4 and post-16 are clearly interrelated and have some common features, the context in which the qualifications are operating is different.

25. Concerns over the qualifications approved for funding at key stage 4 are not as widespread as at post-16 because many non-GCSEs used at key stage 4 are drawn

¹¹ All 16 to 19 year-old students are funded for an individual study programme. Study programmes have a core aim, are tailored to each student and have clear study and/or employment goals reflecting the student's prior attainment. They include substantial qualifications; mathematics and English for students who have not achieved grade A* to C or 9 to 4 at GCSE in these subjects; work experience or work preparation; and relevant non-qualification activity. The study programme guidance is at DfE (2018), '[16 to 19 study programmes: guide for providers](#)'.

from those that are included in performance tables: there are 75 such qualifications approved for inclusion in the 2020 tables (called Technical Awards¹²). The proportion of entries at key stage 4 that do not count in the performance tables – some 11% of all entries – is low, compared to the 41% of entries in the 16 to 19 phase which do not count in the performance tables. In addition, Ofsted’s new framework proposes a sharper focus on what is taught in schools and how it is taught, ensuring that schools are preparing pupils to succeed at the next stage. Subject to consultation, this new approach will take effect from September 2019.

26. Given this, we do not think there is a strong case at this stage for intervening in the market to decide which subjects should be available as Technical Awards pre-16, beyond retaining the existing rules about overlap with the EBacc.
27. However, we do have concerns about the reliability and validity of some of these qualifications and about possible grade inflation. We therefore welcome the programme of work that Ofqual has set in train to strengthen controls in technical qualifications. Ofqual will be consulting on specific proposals in due course. We will work closely with Ofqual to ensure that a combination of the changes it will put in place and our rules for deciding which qualifications count in performance tables at key stage 4 mean that we have greater confidence in the quality of qualifications included in the tables and in the maintenance of standards over time.
28. We will also ensure, as the post-16 review develops its proposals for change following the first stage consultation, that potential impacts from the post-16 review on qualifications available to students under 16 will be carefully considered before decisions are taken.
29. Further information on our approach to the reform of non-GCSE qualifications at key stage 4 and the evidence underpinning this, is provided at [Annex C](#).

Making sure the review works for those with special educational needs and disabilities, and from disadvantaged backgrounds

30. Everyone, regardless of their background or needs, should be able to achieve their potential, gaining the skills, experience and confidence they need for life and work. For most, gaining qualifications will be key, but it is only one element of their studies. Work experience and other non-qualification activity can also be crucial to

¹² Technical Awards are level 1 and 2 qualifications that provide 14 to 16 year olds with applied knowledge and practical skills. These qualifications are included in the key stage 4 performance tables.

independence, employment opportunities and making a successful transition to adulthood.

31. We know that those with SEND or from other vulnerable groups can face barriers to sustained employment. As the statutory SEND Code of Practice¹³ makes clear, the vast majority of young people with SEND, including those with complex needs, are capable of sustainable paid employment with the right preparation and support. These young people should have clear, high quality pathways leading to a range of good careers.

32. Of all 16 to 19 year olds studying at level 3 and below in full-time education, those with SEND¹⁴ represent 17%, and those eligible for free school meals (FSM) represent 14%. Both groups are over-represented in post-16 qualifications at level 2 and below, and within level 3 they are over-represented in AGQ and other level 3 qualifications (see table below). It is our firm intention that this review will have a positive effect on disadvantaged students and those with SEND, by making sure every available option is a good one and that each qualification supports progression.

Highest Study Aim of 16 to 18 Year Olds	SEND Support	FSM Eligibility
Level 3	9%	10%
*A/AS Level	5%	8%
AGQ	14%	15%
Level 3 apprenticeship	12%	9%
Other level 3	17%	14%
Level 2	29%	20%
GCSE	32%	24%
Technical Certificate	29%	21%
Apprenticeship	20%	13%
Other level 2	40%	27%
Level 1 and Entry Level	64%	33%

* This also includes some other academic level 3 qualifications, such as Pre-U.

Table 1: Highest study aims of 16-18 year olds in 2016/17, by FSM and SEND eligibility at academic age 15¹⁵

¹³ DfE (2015), '[SEND code of practice: 0 to 25 years](#)'.

¹⁴ Defined as those who, at the end of key stage 4, received SEND support, had a SEND statement, or an education, health and care plan.

¹⁵ DfE (2019). '[Post-16 students and qualifications at level 3 and below in England](#)'.

33. We want to improve outcomes for everyone, at whatever level they are capable of studying, and whatever their needs. In our work to develop T Levels we are making sure that each component of the programme is accessible to those with additional needs. We will also make sure there are high quality alternatives for young people not ready to begin a T Level at age 16, or for people of all ages whose career plans or needs might require a different approach. For a small number, including a higher proportion with SEND or other additional needs, gaining a post-16 qualification below level 3 will be a good outcome.
34. The review will assess carefully how any proposals may affect disadvantaged groups. Through the consultation, we would welcome views highlighting the needs of specific groups¹⁶. At the end of the consultation, on page 35, we ask for any further comments about the impact of the review on students from disadvantaged backgrounds, those with SEND, or others with a protected characteristic under the Equality Act 2010.

¹⁶ DfE (2019) [‘Review of post-16 qualifications at level 3 and below in England: interim impact assessments’](#).

Principles

35. The government's aim is to create an ambitious technical education system – one that stretches students and supports their personal development. It needs to lay the foundations for continuing education, technical excellence and high quality employment throughout their adult lives. This is vital if, as outlined in our Industrial Strategy¹⁷, we are to see many more people equipped to acquire the intermediate and higher technical skills that we know our economy needs now and in the future. To support this, we want a simplified qualifications system that everyone understands and in which they have confidence.
36. There was positive support during our T Level consultation for simplifying the existing qualifications system. A majority of respondents endorsed the high level principles that we proposed should guide us when reviewing which qualifications at level 3 and below should be funded in the future. Some respondents said the principles should be more clearly defined. In relation to qualifications at level 2 and below, others stressed the importance of taking account of varying student needs.
37. After reflecting on our T Level consultation findings and bringing together the level 3 and the level 2 and below reviews, we have decided to proceed based on the principles that all qualifications should:
- have a distinct purpose and be truly necessary in the new simplified system
 - support progression to successful outcomes – to higher levels of study or a meaningful job
 - be good quality¹⁸

The following paragraphs consider these principles. They also look in more detail at how these principles should be applied across the different levels.

Purpose and necessity

38. The purpose of a qualification, meaning the role that it plays for students taking it, and progression, meaning the ability of qualifications to lead to their intended outcomes, are interdependent. A clear and necessary purpose is of limited value if it does not consistently deliver successful outcomes.

¹⁷ BEIS (2017). '[Industrial Strategy: building a Britain fit for the future](#)'.

¹⁸ DfE (2018). '[Implementation of T Level programmes consultation response](#)'.

39. Well designed, well recognised and assessed qualifications in which people have confidence have an important role to play for students, employers and the economy:

- For all students, they provide important recognition of the knowledge and level of skill which they have acquired in a given subject area and the wider progress and commitment they have made. Qualifications can be used as evidence in job applications or provide the step to higher levels of study and career progression. They can also be a goal to aim for and an important source of personal motivation throughout their course of study and beyond¹⁹.
- For employers, schools, colleges and universities, they offer independent confirmation of a person's skills or knowledge, enabling them to differentiate between candidates, and recruit or promote with greater confidence.
- For the economy as a whole, they contribute to labour mobility and the efficient identification and deployment of available skills.

40. We believe that for a qualification to have a distinct purpose it must lead to, and be designed to lead to, an employment or educational outcome at an agreed and clearly defined level. Where a qualification's outcomes are specific and clearly defined, they help providers to tailor teaching closely to the needs, aptitudes and career goals of individuals.

41. In the present system, qualifications are designed, with varying amounts of flexibility, to play a number of roles:

- to lead directly to a clearly defined employment outcome (including career progression) or higher technical education. These include Tech Levels and Technical Certificates, new T Levels, and other qualifications designed to develop occupational skills.
- to lead directly to continued and higher levels of academic education. These include A Levels and Applied General qualifications.
- to develop broader skills, such as personal, social and employability skills.
- to develop literacy and numeracy.

42. In the Skills Plan we set out an ambition to provide students with a clear choice between high quality technical and academic options. With this clarity in mind, T Levels have been designed to be the gold standard level 3 technical qualification, with a primary purpose of offering a direct route into skilled employment or into relevant technical options in the form of higher levels of technical study or

¹⁹ DfE (2018). ['Implementation of T Level programmes consultation response'](#).

apprenticeships. We believe this clarity and distinctiveness of role should apply to all qualifications at levels 3 and below, giving all students clear choices in the qualifications they study.

Question:

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.

43. There is also a range of qualifications designed to give broader personal, social or employability skills. These qualifications are found in the Preparation for Life and Work subject sector area²⁰. This category takes up over 19% of qualifications approved for funding at level 3 and below. Whilst the figure is just 3% of level 3, it increases to 10% at level 2, and takes up a significant proportion of level 1 and entry – 29% and 67% respectively²¹.

44. Recent research into level 1 and below qualifications found that those with a clearer vocational focus had better labour market outcomes than the more generic qualifications in personal, social and employability skills²². Clearly, the skills themselves are important²³, and funding should continue to reflect their role in broader study, though we want to test whether they are necessary as standalone qualifications.

45. We are seeking views on whether there is sufficient scope for these skills to be taught through broader study, rather than as standalone qualifications, and if there are any other changes we should consider to support this²⁴. When considering these qualifications, we will take into account the needs of the National Retraining Scheme as it is developed and implemented.

²⁰ The Preparation for Life and Work subject sector area includes the sub-categories Foundations for Learning and Life and Preparation for Work. It includes some qualifications in English and mathematics and specific vocational subjects. The next question seeks views specifically on the personal, social and employability skills qualifications.

²¹ ESFA list of qualifications approved for funding 16 to 19 as of August 2018.

²² De Coulon and others (2017). '[Young people in low level vocational education: characteristics, trajectories and labour market outcomes](#)'.

²³ Taylor and others (2017). '[Good Work: the Taylor Review of Modern Working Practices](#)'.

²⁴ For 16 to 19 year olds, through the non-qualification activity in study programmes. For adults, through packages of learning developed through the 'local flexibility' offer in the Adult Education Budget.

Question:

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

Progression

46. Even where the purpose or intended outcome of a qualification is distinct and clear, the qualification should also be necessary – that is, the knowledge and skills delivered by the qualification should be in demand – by either employers or students looking to use them as the springboard to higher levels of study. Qualifications at all levels should define the skills, knowledge and (where appropriate) behaviours which students will be able to demonstrate on successful completion. They should confirm what higher level of study the student will be equipped to undertake upon completion or identify what skills and behaviours they will be equipped to apply in the workplace.
47. To ensure this is the case, we want to consider how qualifications will meet the needs of the employers or the further or higher education institutions to which students will most likely progress after they complete the qualification. For employment-focussed qualifications, there is a range of approaches that can be taken, from employers endorsing a given qualification, to approaches where employers have a more formal role in development. For academic qualifications we want to ensure that they provide sufficient rigour to allow students to succeed in higher education and that they can be compared fairly with A Levels.
48. Qualifications can have a clear purpose and can appear to be necessary and in demand, but this provides no guarantee that students will progress to the intended outcomes. To inform decision-making throughout the review we will use destination data showing how students move through the system. The data allow us to look at student destinations and help us to assess whether qualifications or groups of qualifications are leading to successful outcomes and fulfilling the role for which they were developed.
49. We have good data on the outcomes of students who progress to higher education, including those who study towards degrees, higher apprenticeships and higher technical qualifications (such as foundation degrees or higher national diplomas and certificates). The data covers study that takes place in universities, alternative providers and the further education sector. We are able to look at the success of qualifications in enabling students to gain entry to higher education, their achievement (e.g. degree classification gained at university), and their subsequent

employment outcomes. The number of students entering university using Applied General qualifications (or similar qualifications that pre-date the introduction of this category of qualifications in performance tables) has increased significantly in recent years, coinciding with the growth of entry to higher education overall. This is especially the case for students from poorer or some black and minority ethnic (BAME) backgrounds²⁵. Many students entering with Applied General qualifications are lower-achieving in comparison to students who gain a place at university through A Levels²⁶, and are more likely to drop out. We want to understand the role of Applied General and other qualifications in supporting progression to successful outcomes and whether, in some cases, students would be better served by taking T Levels, a level 3 apprenticeship or A Levels. In this section we ask what additional data might be available to explore this. Later, on page 24, we invite views on the role which qualifications other than A Levels and T Levels should play in future at level 3.

50. Data about longer-term outcomes from level 3 qualifications, such as wage returns for higher education leavers, are only available for older qualifications that, in many cases, have been replaced. We have much less information about outcomes for new versions of qualifications that have been reformed to meet performance table criteria and will need to consider this carefully when reviewing the available evidence.

51. The data will also enable us to determine where qualifications support progression to further education and apprenticeships up to level 3. We can see whether qualifications lead to progression to higher levels, for example from level 2 to level 3. We know that this data is also complex and that qualifications are used in different ways. For example, some providers see some level 2 qualifications as the default starting point of a particular level 3 programme. This approach will have an impact on progression data for qualifications for which this practice is common.

52. Data we hold about progression to employment tell us less about student outcomes. We can tell whether students leave education to go into employment and whether that employment is sustained, but we cannot tell whether that employment was directly relevant to the qualifications taken. We can also identify students' later earnings but not occupation.

Question:

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?

²⁵ DfE (2019). [‘Review of post-16 qualifications at level 3 and below in England: the current system and the case for change’](#)

²⁶ Ofqual (2018). [‘An exploration of grade inflation in “Older Style” Level 3 BTEC Nationals’](#).

Question:

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

Quality

53. We would like views on what the main indicators of quality should be for all qualifications approved for funding in the future. The criteria that the department uses to approve qualifications for performance tables, and the international good practice that has informed and shaped T Level design, provide us with some aspects of quality to consider.

54. Currently, the Education and Skills Funding Agency (ESFA) approves qualifications for funding where they are externally awarded and regulated by Ofqual. Of the 12,100 qualifications²⁷ currently approved for 16 to 19 year olds, less than 15% have been approved for inclusion in the 2020 16 to 18 school and college performance tables²⁸.

55. To be approved for performance tables, qualifications must address a number of specific quality related requirements²⁹:

- Declared purpose – the aims, objectives and intended purpose of the individual qualification in question.
- Recognition – from industry and/or higher education institutions.
- Minimum size – of guided learning hours (GLH) – 150 GLH for Technical Certificates (level 2) and Applied General qualifications (level 3), and 300 GLH for Tech Levels (level 3).
- Appropriate content – the specific content that must be learned to achieve the qualification, and the associated contribution to the overall grade, which must make up at least 40% of a Technical Certificate or a Tech Level, and 60% of an Applied General qualification.
- Appropriate assessment – rigorous and appropriate assessment arrangements, and minimum external assessment thresholds (25% for Technical Certificates, 30% for Tech Levels, 40% for Applied General qualifications).

²⁷ ESFA list of qualifications available for funding 16 to 19 as of July 2018.

²⁸ DfE (2019). '[16 to 18 qualifications, discount codes and point scores](#)'.

²⁹ DfE (2017). '[14 to 19 technical and applied qualifications: technical guidance](#)'.

- Synoptic assessment – assessment arrangements that require students to demonstrate that they can identify and use effectively in an integrated way an appropriate selection of skills, techniques, concepts, theories, and knowledge from across the whole vocational area, which are relevant to a key task.
- Grading – a distinction, merit, pass, fail structure or a more detailed grading scale, that applies to the overall qualification and reflects a student's attainment across the qualification's content.
- Employer involvement – in the delivery and/or assessment of Technical Certificates and Tech Levels (not required for Applied General qualifications).
- Progression – evidence that students have secured related employment, apprenticeships, related training or continued study at a higher level (once the qualification has been completed by a cohort of students).
- Proven track record – achieved by at least 100 students aged 16 to 19, in at least three providers, in one of the first two years following approval.

56. While many of the above indicators remain important, we believe they could go further. How they are applied is key. As discussed, qualifications should not just have a clearly defined purpose but should deliver on that purpose and allow progression to successful outcomes. Equally, it is important that their stated purpose and intended outcomes remain relevant and current. We think building a greater emphasis on currency into our quality requirements is important. Employer involvement is also important. The introduction of T Levels will set a new standard for technical education, raising the bar in terms of their stretch and rigour. Key features of T Level design are:

- a. Content designed by employers and based on nationally agreed and recognised occupational standards.
- b. Strong emphasis upon industry placements of a minimum of 45 days in duration.
- c. A new level 3 technical qualification that will provide both theoretical knowledge and practical skills, with rigorous assessment processes appropriately tailored to the content.

57. Meeting these ambitious design principles means that T Levels must be large programmes of study, equivalent to the size of three A Levels.

58. While we want to see some common indicators of quality in all technical qualifications, such as employer endorsement or a clear route into occupations, other features, including size, structure and forms of assessment, are also key and need to be tailored closely to a qualification's purpose. We are keen to seek views on this.

59. We know that many colleges and schools will deliver the same qualification to a wide range of students, including adults. Older adults might have different prior experience, personal circumstances or aspirations for study than younger students. They might want to access a qualification on a part-time or other flexible basis and will want their previous skills and experience to be taken into account in the learning and assessment delivered through a qualification. We want to seek your views on anything we should consider as part of the design of qualifications to address these accessibility issues.

Question:

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

Question:

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

Question:

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

Applying our principles – our broader ambitions

60. In the previous section, we sought views on the key features of the main principles we have said should guide the review and future decisions on which qualifications should be approved for funding. The following section looks at the principles in the context of the developments now underway and the changing qualifications landscape.

Making T Levels and A Levels the options of choice for students undertaking level 3 classroom-based education

61. At level 3, qualifications are designed to prepare students for further study, or to enter skilled employment, or to support career progression.

62. We want there to be clearer and simpler options for those ready and able to study at level 3 – T Levels and A Levels for those choosing classroom based study, or apprenticeships for those choosing a work-based option.

63. T Levels are intended to provide new, world class technical education, and we want as many people as possible to benefit from them, just as many thousands of young people on the academic route already benefit from rigorous and well-respected A Levels.

64. Subject to the review and the outcomes of our consultation, we expect that where a qualification at level 3 overlap with a T Level or A Level it would not, in future, be approved for funding in relation to 16 to 19 year olds. We need to consider carefully how such overlaps will be defined. They may, for example, take into account both purpose and intended educational outcomes but also other factors, including the content, size and scale of the qualification. We would welcome views on this.

65. With regard to overlap with A Levels, we recognise that this proposal encompasses a broad range of qualifications, a number of which are valued by providers and students. We want to consider carefully the evidence and understand the roles that such alternative qualifications might play.

66. We recognise, too, that there will be exceptions:

- T Levels will not cover all occupations so there will be a continuing need for a small number of technical qualifications outside of the T Level framework to meet specialist or “niche” skills needs.
- There will need to be a high quality set of qualification options available for adults looking to improve their skills or retrain.

67. Where there are exceptions, these qualifications will still have to meet the principles that are set out earlier in this consultation document to be approved for public funding.

Question:

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

- a) for 16 to 19 year olds? Please give reasons for your answer.**
- b) for adults? Please give reasons for your answer.**

Question:

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.**

Getting more people to level 3

68. Our aim is that more people will be motivated and supported to achieve a level 3 qualification, and benefit from the opportunities that come with it, such as improved job prospects and wage returns. We believe many more people across the country have the potential, with time and support, to do this.

69. Qualifications themselves are one part of the answer and we need to consider them in the context of broader study and the wider system. The recent Ofsted research report on level 2 study programmes suggested there was more the department could do to support providers to set a more consistent approach to whether a student enters a level 2 or level 3 study programme³⁰. It also highlighted the role of the other study programme components that complement the qualification, such as personal development, work experience and English and mathematics. We know that several providers are already designing some level 2 study programmes around the specific aim of transition to, and completion of, level 3, and we think this review provides an opportunity to share and strengthen best practice.

Question:

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

³⁰ Ofsted (2018). [‘Level 2 Study Programmes’](#).

Question:

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

Developing a transition framework for T Levels

70. We are developing a transition framework that will focus on providing effective preparation for students to complete a T Level. It will be targeted at young people who are not ready to start a T Level at age 16, but who can realistically achieve it by age 19. We think it is important that we focus the transition framework in this way as we implement the new and stretching level 3 T Levels. The transition framework to T Levels will evolve as the qualifications landscape changes following this review.

71. The transition framework should be tailored to prepare this targeted cohort of students for T Levels. Following our stakeholder engagement, we are continuing to design the transition framework. Whilst no firm decisions have been made we think it could include a period of diagnostic information, advice and guidance (IAG) support, English and mathematics, work experience and work-related study, technical skills and pastoral support. We think it could be presented as a framework with key components that are nationally set, but with flexibility for providers to use this guiding framework to package their transition offer at a local level so that it can be tailored to meet the needs of their cohort and context. We will set out more detail in future. No decisions have been made on the inclusion of level 2 qualifications in the framework, but we want to explore this and other issues further through our phased implementation from 2020.

Ensuring high quality outcomes for those who leave education before level 3

Level 2

72. Whilst the primary focus of level 2 study is to enable progression to level 3, for a small number of students entering employment following completion of a level 2 qualification is a good outcome. This might be the case for those where level 2 is an ambitious aim by age 19 or beyond, or where it is an appropriate place to pause study or training due to the need to balance wider caring or work responsibilities. In these instances, we need to be sure that the qualifications that students take are high quality and provide clear opportunities for re-engagement with education and training at a later point. We need to understand more about the outcome for those that are currently entering employment from level 2, and what we might do in the future to measure this better.

Question:

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

Level 1 and below

73. The new system needs to be able to support young people and adults working at level 1 and below post-16. The vast majority of young people at these levels had not achieved grade 4 or C in English and mathematics GCSE by age 16, and 64% had received SEND support at the end of key stage 4³¹.
74. Currently, qualifications at these levels cover a variety of roles: delivering technical skills, supporting literacy and numeracy, or covering broader personal, social or employability skills (we ask about the latter on page 18). Whilst some qualifications are designed specifically to meet one of these roles, others might serve several. We think this review provides the opportunity to clarify the roles of qualifications at these levels, and ensure all are genuinely valued by employers or provide the basis for progression to further study.
75. Study at level 1 and below can be key in attaining personal, social and employability skills. It can also play a wider role in motivating and engaging students and improving wellbeing. Progression at this level is not exclusively marked by a qualification, and recent research has highlighted the importance of curriculum design and giving providers the flexibility to design programmes that are tailored to the individual student and their needs³². We want to know if there are additional principles that should apply to qualifications at level 1 and below to support providers in designing courses that meet particular needs. For example, these might relate to how best these levels of study can support literacy and numeracy, their size, or whether non-qualification activity may be more appropriate.

Question:

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

³¹ DfE (2019). [‘Post-16 students and qualifications at level 3 and below in England’](#).

³² Allan and others (2016). [‘Effective Practice in Supporting Entry/Level 1 students in post-16 institutions’](#); Williams and others (2017). [‘Effective Curriculum Practice at Below Level 2 for 16/17 year olds’](#).

Question:

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

Sustaining a quality system – regulation

76. The current regulatory, accountability and funding system for qualifications covered by the review comprises:

- Ofqual, the independent regulator, maintains standards and promotes public confidence in regulated qualifications. Ofqual maintains the register of regulated qualifications, monitors the performance of awarding organisations and the qualifications they offer and has statutory powers to take action where necessary to address problems where they arise.
- The Education and Skills Funding Agency (ESFA) approves qualifications for funding, considering them against the relevant approval principles³³. Qualifications that meet all of the principles are then added to the ESFA list of qualifications approved for funding 16 to 19³⁴. A similar approach is taken for the approved lists for Advanced Learner Loans and the AEB. This means that they are approved for public funding and teaching to a particular age group. In a separate process, a subset of these qualifications is assessed for suitability for inclusion in performance tables (see paragraph 55 above).
- The Institute for Apprenticeships and Technical Education (the Institute) has the overarching, primary statutory responsibility for technical education standards and for T Level content. It commissions, manages and quality assures the technical qualifications which underpin each T Level. The Institute and Ofqual are collaborating in delivering the quality assurance framework for T Levels.

77. We have an opportunity through the review to go further and re-examine the broader regulatory and accountability structures within which these qualifications sit. We want to establish not just new funding approval criteria, but a system that will support and sustain the higher quality qualifications we need. We want to see higher standards established and maintained over time and between different awarding organisations.

³³ DfE (2019). [‘ESFA list of qualifications approved for funding 14 to 19 ‘Approval Principles’](#).

³⁴ DfE (2019). [‘ESFA list of qualifications approved for funding 14 to 19’](#).

78. We will consider the respective roles of all of these bodies in the future system, as well as the roles of those outside of government, including employers, awarding organisations, schools, colleges, universities and other training providers.
79. We have not made any decisions about the shape of the new system. We believe that improving the quality of qualifications, and maintaining this quality over the longer term, will require change and will take time. The new system needs to be appropriate, proportionate and tailored to the outcome of the review.
80. For this reason, we will work closely with Ofqual and the Institute to develop proposals that will become part of the second stage consultation later this year. These proposals will be developed alongside those for other related policy areas, including T Levels, apprenticeships, the Review of Higher and Technical Education (levels 4 and 5), the Review of Post-18 Education and Funding and the National Retraining Scheme to ensure a coherent approach for technical education as a whole.
81. Improving quality across the full range of qualifications available means making changes to the way in which qualifications are regulated and approved for funding. Ofqual is considering measures designed to strengthen control of outcomes in relation to a range of technical qualifications that fall within scope of this review, and are currently consulting³⁵ on the moderation and verification of centre assessments. This work will help to improve the quality of qualifications in the near future and will complement the long term questions posed by this consultation about the overall shape of the qualifications system needed by post-16 students.

³⁵ Ofqual (2019), '[Moderation and verification of centre assessment judgements](#)'.

Securing early progress

82. Consultation questions on the principles are designed to help shape a new set of criteria that, in future, will determine which qualifications should be approved for funding. We will develop the criteria and consult on them in our second stage consultation later this year. Before we present our plans, we need to take careful account of the impact of the likely changes on all involved and proceed at a pace that will protect the interests of students and the delivery of the education, training and skills needed. We will also continue to work closely with the devolved administrations to ensure that potential cross-border impacts are carefully considered, and with the Metropolitan Combined Authorities and the Greater London Authority to ensure that the impact on the adult education budget devolution is also taken into account. Paragraphs 104 to 108 outline our planned process for the review.
83. We believe that majority of the changes to the funding approval of qualifications should not take place before September 2023, in line with the rollout of T Levels.
84. We believe, however, that where early progress can be achieved and can be accommodated, we should pursue it. We set out our actions and proposals for securing early progress below.

Pre-existing qualifications

85. As the consultation has already described, the large number of qualifications available creates a complex landscape, which makes it more difficult to understand the value of different qualifications. An additional layer of complexity is created where there are two versions of the same qualification available.
86. Following the Wolf Review, the government introduced new requirements that level 3 qualifications had to meet to be eligible for inclusion in performance tables as a Tech Level or an Applied General qualification.
87. In some cases older versions of qualifications have not been withdrawn and remain approved for funding, running in parallel with the newer versions that have been re-developed to meet performance table rules. We call these older versions “pre-existing qualifications”.
88. To drive up quality and quickly remove complexity from the system, we will withdraw approval for funding for new starts on pre-existing qualifications from 1 August 2020. Students already enrolled on these courses will be funded through to completion.
89. We define pre-existing qualifications as those that meet the following criteria:

- Tech Levels and Applied General qualifications at level 3 that last appeared in the 16 to 18 performance tables for 2016 or 2017.
- the pre-existing qualification maps to a current 16 to 18 performance table qualification (a 'redeveloped' qualification). A qualification is 'mapped' against the five criteria below:
- The same awarding organisation must own the pre-existing and redeveloped qualification
 - The pre-existing and redeveloped qualifications must map to the same qualification type – for example, an Applied General qualification does not map to a Tech Level
 - The pre-existing qualification must be in the same sector subject area (at tier 2) as the redeveloped qualification
 - The pre-existing qualification and redeveloped qualification must be similar in size, in terms of GLH (within approximately 10 per cent of each other). For example, if the GLH of the pre-existing version is 120 hours, the redeveloped version will need to have between 108 and 132 hours), and
 - The pre-existing qualification and redeveloped qualification must have similar titles, with a maximum of only a couple of words being different (for example, 'horse management' maps to 'equine management').

90. A small number (16) of pre-existing qualifications are mandated as part of an apprenticeship standard³⁶. The Institute will work with Trailblazer groups to ensure any qualifications that have approval for funding removed will be replaced within the apprenticeship standard by the redeveloped version.

91. Using these criteria, 145 of the 359 Applied General qualifications and Tech Levels approved to count on the 2020 performance tables have pre-existing versions that are still available.

92. The Department will provide the awarding organisations affected with a list of pre-existing level 3 qualifications from which it intends to remove eligibility for funding, and a guidance document that explains how these have been identified. The guidance will also inform awarding organisations that they will have the opportunity to notify the Department (with strong supporting evidence) if they believe the

³⁶ Based on internal analysis of the ESFA list of qualifications available for funding 16 to 19 as of July 2018, and the ['Apprenticeship standards'](#).

Department has made a factual error about a pre-existing qualification and that it should remain approved for public funding.

93. The Department is publishing an impact assessment alongside this consultation. We recognise that stakeholders may have concerns about these changes, and we want to know whether there are additional impacts that have not yet been identified so that mitigating action can be considered.

94. The removal of these pre-existing qualifications does not pre-empt the outcomes of the wider review. Redeveloped qualifications are still in scope of the review.

Question:

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

Qualifications with no enrolments

95. 45% of qualifications at level 3 or below that are approved for 16 to 19 year olds (5,531 qualifications) had no enrolments across all funded offers in 2016 to 2017. Whilst some of these qualifications were new, 42% of qualifications at level 3 or below that are approved for 16 to 19 year olds also had no enrolments in 2015 to 2016³⁷.

96. As part of our ambition to simplify the system, we propose removing from the current approved list the significant number of qualifications that have had no enrolments for the past two years. We would do so before we put in place any new or updated criteria for future approval.

97. This will streamline the qualifications list and withdraw approval for funding from those qualifications that have not demonstrated any market demand over the last two years. It would ensure the list is smaller, easier to navigate, and only lists qualifications for which there is a clear demand from schools, colleges, and students.

98. The criteria we propose to apply in identifying qualifications with no enrolments on an annual basis are:

- Qualifications that have been approved and available for at least two years.

³⁷ DfE (2019). [‘Post-16 students and qualifications at level 3 and below in England’](#).

- Qualifications that had no publicly funded enrolments in the last two years.³⁸

99. We will confirm the criteria for withdrawing funding approval in light of responses to this consultation and provide an assessment of impact in our second stage consultation, which will be published later in 2019. We would expect to withdraw approval for funding from qualifications that meet the criteria for no enrolments from August 2021.

Question:

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

Question:

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

Qualifications with low enrolments

100. We also propose to withdraw approval for funding for qualifications with low enrolments. These are qualifications for which there has been limited demand. The criteria we propose to apply to identify low enrolment qualifications on an annual basis are:

- Qualifications that had fewer than 100 enrolments but more than 1 enrolment in the each of the last two years.
- Qualifications that had fewer than 100 enrolments but more than 1 enrolment two years ago **and** no enrolments in the previous year.³⁹

101. We propose that enrolments should be considered through the 16 to 19 study programme, AEB (excluding traineeships), Advanced Learner Loans and the European Social Fund (ESF) funding offers.

102. We recognise that some qualifications with low enrolments may be niche in nature, relevant to specific industries, specific groups of students or sometimes, to specific geographical areas. There may be a rationale for maintaining funding for some of these qualifications and would like views on the circumstances in which our proposed criteria should not apply, maintaining the focus on our key principles of quality, purpose/necessity and progression.

³⁸ Data in this consultation uses the years 2015 to 2016 and 2016 to 2017, the latest data available.

³⁹ Data in this consultation uses the years 2015 to 2016 and 2016 to 2017, the latest data available.

103. We will confirm the criteria in light of responses to this consultation and provide an assessment of the impact of removing approval for funding for qualifications with low enrolments in the second stage of the qualifications review, which will be published later in 2019. Although low enrolments data are based on post-16, we will consider the effect of removing approval for funding against potential impacts for any of these qualifications that are taken by students pre-16. We would expect to withdraw approval for qualifications that meet the criteria for low enrolments from August 2021.

Question:

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

Question:

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

Shaping the next stages of the review

104. This review provides an opportunity to reassess the existing qualifications available for students post-16 and to build a system which will deliver the best possible outcomes for every student. We wish to proceed at a pace that the system can accommodate, and that allows time for all with an interest to contribute to and help shape the new system.
105. Subject to views offered in response to this consultation and the further development work we have indicated will be undertaken ahead of the second stage consultation, our proposed process over the coming years would be as follows:

Date	Activity
March 2019 – June 2019	<p>Stage 1</p> <p>Public consultation on principles/process to guide the review and action to secure early progress, including the removal of funding approval from pre-existing qualifications.</p> <p>Detailed gathering of evidence on current qualifications, how they are used and the outcomes they deliver.</p> <p>Development of proposals for possible regulatory changes by Ofqual.</p>
June 2019 – December 2019	<p>Stage 2</p> <p>Assessment of consultation responses.</p> <p>Development of detailed proposals for change (including criteria for future funding and any supporting regulatory change) and associated impact assessments.</p> <p>July 2019 [provisional]: publication of decisions on removal of funding approval from pre-existing qualifications.</p> <p>Late 2019 Government response to first stage consultation including second stage consultation on firm proposals for change.</p>
Early 2020	<p>Assessment of second stage consultation responses.</p> <p>Spring 2020 – Government response: final plans for change published.</p>
August 2020	Provisional: funding approval withdrawn from pre-existing qualifications
August 2021	Provisional: funding approval withdrawn from qualifications with low or no enrolments

September 2023 onwards	Removal of approval for funding from qualifications as determined by the review and in line with the rollout of T Levels.
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106. We will continue to build our evidence base on the current qualifications in the system. This, combined with our stakeholder engagement, will give us a clearer picture and we will identify key challenges at regional and local levels as part of this.
107. We will ensure, when our detailed plans are brought forward in the second stage of consultation, that any changes are implemented at a pace that the system can accommodate in line with T Level rollout from 2023. Implementation will include the introduction of a moratorium on new qualifications, so that no further new qualifications are approved for funding during the review period. This is distinct from the moratorium on new qualifications being added to performance tables that is currently in place.

General and equalities impact assessments

108. We are committed to ensuring equality of opportunity for all young people and adults in the education system. It is important for us to consider carefully the possible impacts that changes proposed in this consultation could have on different groups. This will help us not only to identify and mitigate any negative impacts, but also to make the most of the potential positive impacts.
109. An [initial equalities and general impact assessment](#) is set out in the document published alongside this consultation. To help inform the development of the full assessments which will be brought forward in our second stage consultation, we would welcome views on the key issues that should be considered and factored into our assessments.

Question:

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.

Question:

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.

Annex A: List of consultation questions

Heading	Page	Question
Principles – Purpose and necessity	17	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.
	18	Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.
Principles - Progression	19	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?
	20	How could we better use data about student outcomes to monitor and assess the success of future qualifications?
Principles – Quality	22	Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.
	22	Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.
	22	Are there particular quality principles that we should consider for adults? Please give reasons for your answer.
Applying our principles – Our broader ambitions	24	At level 3, what purposes should qualifications other than T Levels or A Levels serve: a) for 16 to 19 year olds? Please give reasons for your answer. b) for adults? Please give reasons for your answer.
	24	How should we determine “overlap” in relation to:

Heading	Page	Question
		<p>a) overlaps with T Levels? Please give reasons for your answer.</p> <p>b) overlaps with A Levels? Please give reasons for your answer.</p>
	24	How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?
	25	How could post-16 qualification reform and broader study best support more people to achieve at level 3?
	26	If level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice.
	26	What are the key roles that qualifications at level 1 and below need to play?
	27	Are there additional principles we should apply to level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.
Securing early progress	31	Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer.
	32	Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.
	32	Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer.
	33	Do you agree we should consider removing approval for funding from qualifications with low enrolments? Please give reasons for your answer.
	33	Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.
Shaping the next stages of the review	35	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

Heading	Page	Question
		characteristic under the Equality Act 2010? Please give reasons for your answer.
	35	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.

Annex B: Qualifications covered by the review and their funding routes

Student	Funding Stream	Availability
<p>Young people aged 16 to 19</p>	<p>ESFA list of qualifications approved for funding 16 to 19</p>	<ul style="list-style-type: none"> • 14 to 16 year olds, • 16 to 19 year olds, or • both
<p>Adults</p>	<p>Adult Education Budget</p>	<ul style="list-style-type: none"> • Qualifications are available for adults aged 19+ from entry level to level 3. • Qualifications are either fully funded or co-funded (c50% government contribution) depending upon a student's age, prior attainment and circumstances. • All level 3 qualifications funded under the AEB are also on the 16 to 19 funded qualifications list.
	<p>Advanced Learner Loans</p>	<p>19 to 23 year olds</p> <ul style="list-style-type: none"> • Taking a second level 3 qualification. <p>24 years old and over</p> <ul style="list-style-type: none"> • Taking a level 3 qualification. <p>Majority of level 3 qualifications on the loans list are also on the 16 to 19 funded qualifications list.</p>
<p>Apprentices</p>	<p>Apprenticeship standard (if mandated in the standard)</p>	<ul style="list-style-type: none"> • All Ages

Annex C: Non-GCSE qualifications at key stage 4

1. In the T Level consultation response, we said that as well as reviewing the qualifications available in the post-16 phase, we would also review the use of non-GCSE qualifications at key stage 4 (that is, ages 14 to 16) and consult on the principles guiding that review.
2. Since then, we have looked further at the issues at key stage 4 and in particular have carried out new analysis on the impact of Technical Awards on pupil attendance and exclusions. This analysis has been published [here](#).
3. We have concluded that although the qualifications systems at key stage 4 and post-16 are clearly inter-related and have some common features, the context in which the qualifications are operating is different in key ways and therefore the issues that need to be addressed and the potential solutions are also different. In particular:
 - Pupils at key stage 4 are, on the whole, already taking mainly GCSEs – in 2017 to 2018, GCSEs accounted for 83% of exam entries at key stage 4, whilst Technical Awards accounted for 5% of exam entries. Most pupils taking Technical Awards took only one such qualification alongside a full suite of GCSEs.
 - Concerns over the qualifications approved for funding at key stage 4 are not as widespread as post-16 because many non-GCSEs used at key stage 4 are drawn from those that are included in performance tables: there are 75 such qualifications eligible for inclusion in the 2020 tables. In 2017 to 2018, the proportion of entries at key stage 4 that do not count in the performance tables – 11% of all entries – is low, compared to the 41% of entries in the 16 to 19 phase which do not count in the performance tables. In addition, Ofsted's new framework proposes a sharper focus on what is taught in schools and how it is taught, ensuring that schools are preparing pupils to succeed at the next stage. Subject to consultation, this new approach will take effect from September 2019.
 - Unlike the post-16 phase, key stage 4 qualifications are not designed to lead directly to particular destinations (for example directly into work or higher education) but to provide a broad, general education. The issues raised about the purpose of qualifications post-16 (from paragraph 38 onwards of the main document) are therefore less relevant at key stage 4.

4. Whilst we are clear that a broad-based academic curriculum at key stage 4, namely the English Baccalaureate (EBacc)⁴⁰, is the best way of keeping pupils' options open and preparing them to succeed in whatever path they choose to take post-16, the Wolf review accepted that for some pupils a proportion of curriculum time might be used for other options. The EBacc leaves space for pupils to study other areas such as a technical subject alongside a broad academic core. School leaders tell us that, for a small group of pupils, Technical Awards can play an important role in keeping them engaged and motivated. The analysis referred to has shown that taking a Technical Award⁴¹ can lead to reduced levels of absence and exclusions.
5. Given this, we do not think there is a strong case at this stage for intervening in the market to decide which subjects should be available as Technical Awards pre-16, beyond retaining the existing rules about overlap with the EBacc⁴².
6. We do, however, want to have full confidence that these qualifications are of high quality and are reliable and valid. Some stakeholders have advised that whilst there is a place for Technical Awards in the curriculum, they have some concerns regarding their vulnerability to exploitation and grade inflation. Additionally, in December 2018, Ofqual published research on legacy (pre-reform) BTECs and found very strong evidence of grade inflation. Although this research applies to level 3 legacy BTECs, there is a likelihood that qualifications with similar characteristics, including level 2 qualifications, are also vulnerable.
7. As with post-16, the performance table rules introduced following the Wolf review have been successful in significantly reducing the number of non-GCSE qualifications which count in performance tables and have provided a measure of assurance of quality. However, they cannot fully substitute for robust regulation. We need to make sure that the incentives on schools are to offer these qualifications only where it is genuinely in the best interests of the pupil and not because it will enhance the school's position in the performance tables. In particular, we must ensure that these qualifications are not subject to grade inflation, making it easier to achieve a given grade over time.

⁴⁰ The government's ambition is that 75% of year 10 pupils in state-funded mainstream schools will start to study GCSEs in the EBacc combination of subjects by September 2022, as an important stepping stone to reaching 90% of year 10 pupils studying GCSEs in the EBacc subjects by 2025. The English Baccalaureate includes English, mathematics, science, history or geography and a language.

⁴¹ Technical Awards are level 1 and 2 qualifications that provide 14 to 16 year olds with applied knowledge and practical skills. These qualifications are included in the key stage 4 performance tables.

⁴² Qualifications which overlap significantly with GCSEs that count towards the EBacc do not count in performance tables.

8. We therefore welcome the programme of work that Ofqual has set in hand to strengthen controls in technical qualifications, on which it will consult in due course. We will work closely with Ofqual to ensure that a combination of the changes it will put in place and our rules for deciding which qualifications count in performance tables at key stage 4 (once the moratorium is lifted) mean that we can have greater confidence in the quality of qualifications included in the tables and in the maintenance of standards over time.



Department for Education

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