

**Review of post-16 qualifications at level 3 in England – Government Consultation**

<b>Heading</b>	<b>Question</b>
Introduction	Q1 – What is your name?
Introduction	Q2 – What is your email address?
Introduction	Q3 – What is your role, or in what capacity are you responding?
Introduction	Q4 – If you are responding on behalf of an organisation please tell us the full name of your organisation, and what type of organisation it is?
Introduction	Q5 – Would you like us to keep your responses confidential?
Level 3 qualifications for 16 to 19 year olds	Q6 – Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16 to 19 year olds choosing technical provision?
Level 3 qualifications for 16 to 19 year olds	Q7 – Do you agree with the funding criteria described in paragraph 47 for the other technical qualifications we propose to fund for 16 to 19 year olds (qualifications providing occupational competence against employer-led standards which are not covered by T Levels and additional specialist qualifications)?
Level 3 qualifications for 16 to 19 year olds	Q8 – Should the Institute create additional T Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s)/occupation(s) and explain why.
Level 3 qualifications for 16 to 19 year olds	Q9 – Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52 to 66? Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?
Level 3 qualifications for 16 to 19 year olds	Q10 – Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?
Level 3 qualifications for 16 to 19 year olds	Q11 – Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?

<i>Level 3 qualifications for 16 to 19 year olds</i>	<i>Q12 – Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?</i>
<i>Level 3 qualifications for 16 to 19 year olds</i>	<i>Q13 – Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?</i>
<i>Level 3 qualifications for 16 to 19 year olds</i>	<i>Q14 – Do you agree with our proposal the IB Diploma should continue to be funded?</i>
<i>Level 3 qualifications for 16 to 19 year olds</i>	<i>Q15 – Do our proposals for academic qualifications for 16 to 19 year olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high quality higher education?</i>
<i>Supporting students to attain the new high quality offer at level 3</i>	<i>Q16 – What additional support might students need to achieve the new high quality offer at level 3?</i>
<i>Supporting students to attain the new high quality offer at level 3</i>	<i>Q17 – What additional support might SEND students need to achieve the new high quality offer at level 3?</i>
<i>Supporting students to attain the new high quality offer at level 3</i>	<i>Q18 – Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?</i>
<i>Supporting adults</i>	<i>Q19 – Do you agree with our proposal to fund the same academic options for adults as 16 to 19 year olds?</i>
<i>Supporting adults</i>	<i>Q20 – Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16 to 19 year olds in exceptional circumstances)?</i>
<i>Supporting adults</i>	<i>Q21 – Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?</i>
<i>Supporting adults</i>	<i>Q22 – Do you agree with our proposed approach to making T Levels available to adults?</i>
<i>Supporting adults</i>	<i>Q23 – Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?</i>

Supporting adults	Q24 – Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?
Supporting adults	Q25 – What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116 above)?
Ensuring qualifications are high quality	Q26 – Do you agree with our proposed approach to reforming technical qualifications?
Ensuring qualifications are high quality	Q27 – Is there anything else we should consider when implementing our proposed approach?
Ensuring qualifications are high quality	Q28 – Do you agree with the proposed approach to qualifications in apprenticeship standards?
Ensuring qualifications are high quality	Q29 – Do you agree with our proposed approach to reforming academic qualifications?
Ensuring qualifications are high quality	Q30 – Is there anything else we should consider when implementing our proposed approach?
Delivery process and timetable	Q31 – What support is needed to smooth the implementation of the proposed reforms?

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Q1 – What is your name?

Jan Ellis

Q2 – What is your email address?

Q3 – What is your role, or in what capacity are you responding?

Drop down menu – selected 'on behalf of an organisation'

Q4 – If you are responding on behalf of an organisation please tell us the full name of your organisation, and what type of organisation it is?

The CDI (Career Development Institute) is the single UK-wide professional body for everyone working in the fields of career education; career information, advice and guidance; career coaching, career consultancy and career management. It has almost 5,000 members

Q5 – Would you like us to keep your responses confidential?

No

Q6 – Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16 to 19 year olds choosing technical provision?

Yes. This is because the need by employers for additional specialist qualifications and occupational competence evidenced by qualification extends beyond those covered by T Levels

Q7 – Do you agree with the funding criteria described in paragraph 47 for the other technical

*qualifications we propose to fund for 16 to 19 year olds (qualifications providing occupational competence against employer-led standards which are not covered by T Levels and additional specialist qualifications)?*

Yes. To be eligible for funding these qualifications need to lead to skilled employment (although not guarantee employment). And securing the qualification should be evidence of attaining the required level of competence (knowledge, skills and behaviours). Also, pathways into skilled employment should not be available only via an apprenticeship.

*Q8 – Should the Institute create additional T Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s)/occupation(s) and explain why.*

No. At this stage it would be better to allow those the approved pathways and occupations to established themselves and to make any necessary modifications, prior to creating additional T levels.

*Q9 – Do you agree with our approach to removing funding approval for qualifications that overlap with T Levels, described in paragraphs 52 to 66? Are there any other factors we should consider when deciding whether a qualification overlaps with T Levels?*

No. To remove funding at this stage would be premature. A better strategy would be to ensure that T levels are **accessible** to everyone, viable and all the components are functioning smoothly. An overlap is not the same as replication and so you need to consider whether the qualification **provides** a valid alternative or complementary approach, thereby enabling greater inclusivity and equality of access. There is a need for greater clarity around how 'adult qualifications' differ from qualifications that confer specialist competence and those that confer occupational competence

*Q10 – Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?*

Yes. These types of qualifications provide opportunity to develop work-related skills not available from qualifications of a more academic studies.

However, the statement 'these are designed to support progression to HE rather than employment', undermines T levels as being the right choice for those who want to progress to higher levels of technical education (e.g. nursing).

*Q11 – Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?*

Yes. These qualifications add breadth and depth of practical skills and academic ability. Hence, they provide greater inclusivity and equality of access.

*Q12 – Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?*

Yes. BTEC qualifications should continue to be funded. A BTEC student may have an advantage when applying to a degree course or employment that relates to their prior study. They've already demonstrated an understanding of, and commitment to, the subject. Also, they may have had relevant work experience

*Q13 – Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?*

Yes. The recognition of the value of alternative programmes in occupational areas such as

sport science or performing arts evidence the value of BTEC programmes.

Also, at a time when there is a known skills shortage of it would be premature to remove funding from alternative qualifications such as BTEC science prior to fully embedding T levels and demonstrating their viability.

**Q14** – *Do you agree with our proposal the IB Diploma should continue to be funded?*

Yes. The decision to exclude it from further consideration from defunding is consistent with evidence that it provides good preparation for HE and employment in a global economy.

**Q15** – *Do our proposals for academic qualifications for 16 to 19 year olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high quality higher education?*

No. A failing of the proposals is the potential for removing tried and tested vocational qualifications that are well-known and highly regarded by HE and Employers prior to ensuring that T levels are available to everyone and fully viable with all the components functioning smoothly. This could restrict opportunity and hinder progression.

**Q16** – *What additional support might students need to achieve the new high-quality offer at level 3?*

Students also need personal guidance from a professionally qualified careers adviser. Gatsby Benchmark 8 states that personal guidance is critical in helping students assimilate and make sense of what they have learned.

All students are expected to have had at least one 1:1 personal guidance interview by age 16, and the opportunity for a further interview by age 18.

Only a careers adviser qualified to at least Level 6 in Career Guidance and Development and Registered with the Career Development Institute (and thus adhering to a professional Code of Ethics) should be employed to fulfil this Benchmark.

This is because they will have the requisite training in career guidance theory, labour market information and guidance skills to help students evaluate the myriad options **and progression routes** facing them and come to a better-informed conclusion regarding which option is right for them.

Careers Advisers are also adept in doing assembly talks, running group work sessions, delivering webinars and much else besides ([https://www.thecdi.net/write/Framework/143297\\_CDI\\_Booklets.pdf](https://www.thecdi.net/write/Framework/143297_CDI_Booklets.pdf)).

**Q17** – *What additional support might SEND students need to achieve the new high quality offer at level 3?*

Every young person needs high quality career guidance from a qualified careers adviser to make informed decisions about their future, whatever their needs. Specific and individualised transition planning that includes identifying potential pathways is central to the SEND Code of Practice. This is because many young people with SEND face multiple challenges and barriers throughout their education experience. Where the differences lie for young people with SEND is in how they need to learn, their priorities within that learning, how far they can get, at what rate they can progress and the willingness of the businesses and people around them to accommodate their needs. With the right support and encouragement, many of these students can access the broad range of career outcomes available to their peers including apprenticeships, employer training schemes, university or

employment.

*Q18 – Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?*

Yes. The breadth of the proposed level 3 qualification groups should serve the needs of SEN students, however this is dependent on further consultation with SEN specialists to inform their ongoing development. Young people with SEND are often described as one generic group and VERY different from each other. For many, lower level qualifications remain important to provide progression pathways.

*Q19 – Do you agree with our proposal to fund the same academic options for adults as 16 to 19 year olds?*

Yes. The qualifications that will be available to 16 to 18 year olds provide adults access to HE and employment

*Q20 – Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16 to 19 year olds in exceptional circumstances)?*

Yes. Importantly the Access to HE Diploma offers greater inclusivity and equality of access to learning. They have proved effective in supporting adults who do not have traditional qualifications to progress to HE and secure more highly skilled and better paid employment.

*Q21 – Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?*

Yes. However, if delivered in a modular way without a central system of assessment units and credit, some form of robust recording to evidence successful completion of each module is needed, that also enables learners needing to transfer to a different educational provider.

*Q22 – Do you agree with our proposed approach to making T Levels available to adults?*

Yes. Making T level qualifications available to adults as proposed should support those seeking to change career or to further develop their technical skills to secure more sustainable employment.

*Q23 – Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?*

Yes. This approach offers greater flexibility that will enable adults to continue their learning and keep abreast of developments in occupational specialisms.

*Q24 – Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?*

Yes. It is important that a range of qualifications continue to be funded so that adults can engage in learning at different stages in their career and as the need for skills and knowledge in the labour market change. **Often small bite-sized courses are better received by adults and employers.**

*Q25 – What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116 above)?*

There are no obvious omissions from the occupational maps of occupations in demand by employers.

*Q26 – Do you agree with our proposed approach to reforming technical qualifications?*

Yes. The proposals should provide more consistency in the quality of training across all level 3 vocational qualifications and an increased likelihood of meeting employer needs. These proposals should lead to them having greater recognition and being more highly valued.

**Q27** – *Is there anything else we should consider when implementing our proposed approach?*

Yes. It is vital that all learners have opportunity for a personal guidance interview with a qualified careers adviser to support them in making an informed decision when deciding which occupational pathway and qualification is best for them. As the consultation document clearly says in para. 86, it is important that every student is given the support they need to achieve their potential. To ensure this happens it will be absolutely vital that students receive the right information, advice and guidance and are enabled to choose the right option to meet their career and learning aims.

The implementation should align with the Gatsby Benchmarks and ensure that every learner has opportunities for guidance interviews with a **L6 or above, qualified** careers adviser. These should be available whenever significant study or career choices are being made. They should be expected for all learners and timed to meet their individual needs.

**Q28** – *Do you agree with the proposed approach to qualifications in apprenticeship standards?*

No. As it stands, a significant weakness of the current proposal is that there is no requirement for the Institute to consult with employers/service providers and respective professional bodies representing members of the occupation. The proposal should make transparent that consultation with employers/service providers will form part of the review process when considering whether the qualification(s) continues to meet the criteria for inclusion in the apprenticeship and potential defunding.

A further consideration is the recognition that a key purpose for the inclusion of qualification with an apprenticeship is to enable further future progression and the movement of employees between organisations.

**Q29** – *Do you agree with our proposed approach to reforming academic qualifications?*

Yes. However, any new rules will require a high level of clarity in defining what is required in terms of the features and characteristics that must be demonstrated to be considered for funding, to ensure the process is robust and coherent.

**Q30** – *Is there anything else we should consider when implementing our proposed approach?*

The proposal should make transparent that consultation with employers/service providers and professional bodies will form part of the review of features and characteristics that qualifications must demonstrate to be considered for funding approval prior to Ofqual setting new rules.

**Commented [JE1]:** Does this make sense?

**Q31** – *What support is needed to smooth the implementation of the proposed reforms?*

There needs to be ongoing communications with learning institutions, employers, service providers (e.g. career guidance providers) and professional bodies such as the Career Development Institute, so that the reforms to qualifications are fully understood and that information disseminated to learners.

To allow for an orderly consolidation, sufficient time should be granted for new qualifications to be embedded and established prior to the removal of existing qualifications and/or funding. At a time of significant change within the labour market and huge economic

uncertainty, this consideration is critical where the attainment of the vocational qualifications is dependent on the successful completion of an industry placement.