

# Post 16 Level 3 Consultation Outcomes

## JCQ Joint Statement

### August 2021

These published outcomes make clear the policy intention to make seismic cuts to the volume of vocational and technical Level 3 qualifications currently available and to do so at pace.

The reforms concentrate on changes to qualifications but, in many ways, qualifications are only a proxy for the rich and varied programmes offered by the further and higher education, for the quality and experience of those who deliver these programmes, for the skills and opportunities gained by students, and for the long-established networks of local and national employers. The removal of 2,000 existing qualifications will have a fundamental impact on the entire system, risking a hiatus in essential provision and creating strains at a time when colleges and universities need to be at their very best.

### Ensure current and future skills needs are met

The impact of the pandemic has contributed to an imbalance in our skills and employment system, creating risks of skills shortages in key areas such as Health and Social Care, Logistics, and Hospitality, which has heightened the need for a responsive system. Flexibility and responsiveness will also be needed to support the many young people who will need support to recover lost learning as part of their next phase of education and training. And we are acutely aware that a system is needed which can respond at pace and with imagination to develop citizens with the resilience to respond to the impact of the growing climate emergency.

It is essential that these broader factors are taken into account so that the system builds on existing strengths and is not hamstrung by centrally managed approaches to funding and qualification development. Although there is much to commend T Levels, the jury must be out as to whether they are the complete answer to all the technical training that our future economy will demand, or, indeed, whether the model for their development will be responsive enough to react to or anticipate skills shortages.

### Slow down the speed of the reforms

We would urge the DfE to build into its reforms the necessary ongoing monitoring, evaluation and risk analyses and to allow for some further flexibility within its timelines. Without such safeguards there is a real risk that the pace of change, with the removal of thousands of existing courses, would lead to unmanageable pressures bearing down on a system already under pressure. Providers, teachers and lecturers will need time and support to take on board such significant changes.

There is also a risk that qualifications will be removed too early, particularly before T Levels are fully embedded. This could put in jeopardy the pipelines to just those skilled occupations this country needs.

## **Ensure all learners have equal opportunities to study and progress**

Most importantly, we would wish to see these reforms managed in such a way that there is no hiatus in provision whereby learners in some parts of the country would be left with no appropriate options for further study. This could have a considerable impact on their life chances and on social mobility for the 68,000<sup>1</sup> learners accessing HE each year with technical qualifications. It would also impact more broadly the 50% of learners that don't follow a straight A Level pathway into further study, apprenticeships or employment.

We were disappointed that the DfE chose to launch its outcomes with a press release that described many existing qualifications as 'poor quality' without any evidence to support this. UK qualifications are widely recognised for their excellence and make a significant contribution to UK exports<sup>2</sup>. Even more importantly it is unfortunate that young people who have undergone huge efforts to achieve qualifications should have their achievements undervalued in this way.

We welcome the recognition of the contribution applied general qualifications make to supporting access to high quality university courses and are pleased that these types of qualifications will still be eligible for funding. However, it is a shame that this will only be the case, except by rare exception, where such qualifications are the same size as a single A Level.

We support the plans to make space in the technical route for specialist qualifications and for qualifications in sectors which are not covered by T Levels. It is also to be welcomed that the consultation outcomes acknowledge how important it is that apprentices can access qualifications as part of their apprenticeship if it is appropriate to do so. We urge the government to review the role of qualifications in apprenticeships which are, currently, largely qualification-free. It is not the intention of JCQ to undermine apprenticeships, nor do our members want more qualifications for the sake of it, our concern is that having fewer qualifications to choose from will have a major negative impact on learner choice and may limit development options if there are not sufficient labour market opportunities to support apprenticeships.

## **Continue to work together to ensure a coherent system**

We note that Ofqual is committed to consulting on criteria for reviewing the quality of technical and vocational qualifications and that IfATE and the Employment and Skills Agency (ESFA) will also be developing criteria to support their roles in recognising and funding qualifications. JCQ is keen to work with government and its agencies to ensure there are transparent processes for making funding decisions. These criteria should be linked to processes that mitigate the risks, as we identified earlier, that come with defunding large numbers of existing qualifications at pace.

Finally, we would continue to call for greater coherence of policy thinking across the UK with regards to technical and vocational education and accreditation. There is a danger that the ecosystem becomes too fragmented to support the high quality provision at the heart of the reform ambition. This also needs to consider progression within sectors; from level 2 to level 3 and from level 3 to level 4 and 5 as well as transferability within devolved nations. This is already frustrating and confusing for employers, damaging for learners' life chances and potentially inefficient and ineffective for the UK economy as a whole.

---

<sup>1</sup> UCAS

<sup>2</sup> £180m annually according to Ofqual annual report from Feb 21

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/960952/Annual\\_Qualifications\\_Market\\_Report\\_academic\\_year\\_2019\\_to\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/960952/Annual_Qualifications_Market_Report_academic_year_2019_to_2020.pdf)