



Correspondence

Qualifications Review Consultation Response

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1. Overview

We support the government’s intention to increase confidence in level 3 qualifications, ensuring that there are clear opportunities for learners to progress from high quality qualifications into skilled employment or further study.

Independent regulation will play a critical role, both in achieving this intention and ensuring an effective qualifications market is available to learners. Where necessary, we will seek to set additional rules for the purpose of securing greater assurance of the validity of publicly-funded qualifications. The Institute for Apprenticeships and Technical Education (the Institute) also has an essential role to play – taking the lead in ensuring that technical qualifications meet the needs of employers – and we will continue to work closely with both the Institute and the Department for Education (the Department) to ensure coherence and clarity as we develop our approaches.

Level 3 qualifications serve a wide range of learners with a variety of needs and ambitions. The reforms proposed are significant and there is a range of benefits that can be realised. Implementation of the reforms will require careful design to manage the inherent risks and we set out our view of these here for the Department’s consideration.

2. Potential impacts on learners

We recognise the potential benefits for all learners at level 3 from the proposed reforms, which include a clearer landscape for funded qualifications, improved quality and greater confidence in the currency of the qualification they achieve.

In recognising the benefits, we must also remain alert to the potential adverse impacts that these reforms may risk. As acknowledged by the Department’s impact assessment, the qualifications that appear more likely to be removed from funding currently have a higher proportion of learners with particular protected characteristics (such as disability, ethnicity or gender) or who are disadvantaged. It is important to consider how the qualifications funded in future can be designed to continue to allow a diverse range of learners to access level 3 qualifications effectively and successfully.

It is also important to reflect on how the variety of level 3 qualifications is currently used by different groups of learners. A number of qualifications are anticipated to be defunded under the proposals; [the Department’s consultation Impact Assessment](#) estimates that the qualifications that may no longer be funded could account for around 62% of current non-A level 16 to 19-year-old enrolments at level 3 – and yet we know that the number of learners using qualifications other than A levels to access higher education is growing, in particular the use of a combination of academic with smaller vocational and technical qualifications.

We can see from [UCAS data about 2019 undergraduate admissions](#) that the number of applicants accepted to higher education with A levels alone has fallen from 63% in 2017 to around 60% in 2019. While this accounts for more than 145,000 learners, nearly 22,000 learners were accepted with BTECs only in 2019 along with almost 18,000 learners who combined A levels with BTECs. This is not an insignificant number and we should consider the impact on learners who may not be able to benefit in such a way when the reforms introduce an apparently more binary choice around qualification purpose and content.

One key intention of the proposed reforms is to establish two clearer pathways of study with A levels and T levels as programmes of choice for 16 to 19-year old learners, recognising particularly that T levels have been developed in collaboration with employers to make sure the needs of industry, as well as learners, can be met. We do, however, see a potential risk in relation to T levels in that some of the design features may appear to learners as barriers to accessing the programme of study, in particular the size and structure of the T level programme. While providers and awarding organisations are required to ensure qualifications are accessible, some learners, including those with SEND or caring responsibilities, may find T levels less well-suited, too big or not sufficiently flexible for their individual study needs.

As T levels are only now beginning to establish themselves for 16 to 19-year old learners, we also see some risk to the surety of the overall qualifications offer for learners of all ages. This is due to the timescale proposed for removing funding from qualifications that are seen as alternatives to T levels. Throughout each stage in the proposed timeline, alternative qualifications may cease to be funded, and providers will adapt their offer including transitioning to T levels. This will create sizable change in centre offer at a point when T levels are relatively new. This challenge may be most pronounced for the wave 4 T levels which will have one year to bed in before funding for alternatives, including established Tech Levels in subjects such as animal management, is removed. The Department may wish to consider whether a slightly more extended period of implementation of these reforms could be utilised.

Overall though, the drive to ensure that learners can choose from a range of high quality qualifications is important and we welcome it. We know from [our work to introduce regulations for some Key Stage 4 performance table qualifications](#) that reforms aimed at addressing weaknesses in qualifications may have the potential to remove some of the features of qualifications that can help to motivate learners. It is important that a balance is found so that placing additional controls on qualifications, or increasing the focus on comparability between them, does not impact on how qualifications can deliver on their intended purposes. We are taking this into account as we work with the Department and the Institute to determine a suitable approach to qualification review and funding approval.

3. Potential impacts on the qualifications market

We can predict that de-funding some existing qualifications will lead to some market instability in the years after the reforms as a number of centres will choose to change the qualifications they offer, particularly if they are reliant on public funding.

It is not straightforward, however, to predict how the 120 awarding organisations who currently have level 3 qualifications eligible for 16-19 funding might respond to the reforms. For some, this may offer opportunities for growth. Conversely there may be others who are significantly impacted by the de-funding proposals, for example, if their business model is currently heavily reliant on their funded qualifications. Indeed a number could potentially lose the majority or all of their level 3 funded offer as a result of the reforms.

We have a responsibility to identify where there are risks to learners if, for example, an awarding organisation becomes financially fragile or market instability causes a fall in confidence in regulated qualifications. We will continue to monitor such risks as these proposals are further developed and implemented.

4. Implementation

The timescale proposed for the reforms the Department intends to achieve is ambitious, with the first funding decisions proposed to be made by the summer of 2022. It is important for the Department to respond with some urgency to their consultation and clearly set out in detail their finalised policy for the qualifications that will be funded in the future. This would include further clarity about content overlap, and a clear steer as to the desired overall level of quality for all funded qualifications at level 3. This detail will enable us to develop an effective approach intended to provide greater assurance and enhance the validity of publicly-funded level 3 qualifications in future.

In order to deliver against the current plans, awarding organisations will need to give much attention to reviewing and redeveloping their qualifications more immediately, in 2021. We appreciate the attraction of early implementation, but 2021 will be an exceptionally demanding year for awarding organisations, because of the adaptations and flexibility we require in order that they deliver awards safely and sufficiently. Awarding organisations do need to concentrate on managing the continuing implications of the coronavirus (COVID-19) pandemic, so creating delivery risks such as the late issue of results for learners in 2021. We would ask the Department to consider whether there are aspects of the proposed reforms for which implementation could be delayed by a year, in recognition of these exceptional circumstances.

We will continue to work closely with the Department and the Institute to consider the requirements and processes that can be put in place, ensuring that we can deliver an efficient and effective approach. We are alert to the risk of introducing undue complexity or burden into the system while at the same time trying to simplify the landscape of qualifications and we are committed to achieving coherence between the approaches taken by the Department, Ofqual and the Institute.

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