

Review of post-16 qualifications at level 2 and below in England - Edge Foundation Response

Question 6:

- I. **Do you agree that we should fund qualifications that support progression to level 3 technical provision?**

Yes, we agree that Government should fund qualifications that support progression to Level 3. There will be many learners keen to progress onto a higher level of study and it is important to support this.

However, there seems to be an over-emphasis from Government on the importance of progression and much policy is focused on Level 3 and above. While there is some acknowledgement from Government that some learners may want to step off after Level 2 to enter employment, we encourage Government to recognise that not all learners may want to progress onto Level 3. For some, the call of employment may be too strong, or they may not want to progress onto further study. We should celebrate those who may wish to step out of education and into employment after a Level 2 qualification, rather than enforcing progression as the predominant route to success.

Question 7:

- I. **Do you agree that we should fund occupational-entry qualifications leading to employment at level 2?**

Yes, as mentioned there will be a number of learners keen to enter employment at Level 2, so we should fund qualifications that enable learners to secure meaningful employment at Level 2.

- II. **Do you agree that these qualifications should include broad route-specific content as well as the knowledge, skills and behaviours required to enter an occupation?**

Yes, the breadth of content as well as sector specific knowledge, skills and behaviours are important for learners before entering an occupation. We would encourage students first to have a broad introduction to the sector / occupation and then to progress up the pyramid towards the more specific knowledge and technical skills required.

Question 8:

- I. **For 16 to 19 year olds aiming to enter employment in an occupation at level 2, do you agree that the main qualification offer that should be available is:**
- **Option A: Group 2 qualification only OR**
 - **Option B: Group 2 qualification and the alternative of taking two smaller occupational-focus quals from group 3 (around 350 GLH) in two different occupational routes?**

It is unclear to us whether students will be asked to choose from **either** Option A or Option B and if these options are mutually exclusive. It is also not clear who will make the choice over which option they will take – will this be down to the learner, to the teacher, to the provider?

Our instinct would be towards Option B. Learners are already forced to narrow down their options too early and for those unsure on which subjects they enjoy, or are unsure of their career path, Option B would seem to provide more opportunity to sample different subjects before narrowing down.

A different way to solve this problem would be to offer a broader and richer curriculum earlier on in the school curriculum. Nearly half [47% of teachers](#) find that the 2014 reforms of GCSEs and A levels place an emphasis on rote learning, squeezing the curriculum and ability to teach broader subjects of interest. As highlighted by the Incorporated Society of Musicians as part of their [#baccforthefuture](#) campaign, measures such as the English Baccalaureate also excludes creative, artistic and technical subjects from counting in school league tables, leading to a fall in the number of students taking up these subjects.

Instead, students should be encouraged to study subjects of interest and variety throughout their school career without the detriment of narrow accountability measures and the pressure to narrow subject choice too early.

Question 9:

- I. **Do you agree that these qualifications should be delivered to 16 to 19 year olds over two academic years as part of a wider study programme leading to employment?**

While a two year course sounds sensible, we would find it difficult to judge the appropriate length of a qualification without first understanding the content that will make up the course. Rather than starting with two years as the starting point, we would encourage content to direct the length of a course. There is a danger that some courses may be stalled just to fit the mandatory two years and some learners may lose interest if the course is not rich in content – so we would advocate for courses to be made shorter where that is appropriated, rather than being extended just to meet the arbitrary two year timeline.

Question 11:

- I. **Do you agree that we should fund qualifications at level 2 that develop cross-sectoral skills for young people?**

We believe that cross-sectoral, transferrable skills are essential for all learners, not just for those studying at Level 2.

The UK currently faces a growing skills mismatch with evidence from the Government's own Industrial Strategy Council highlighting that by 2030, 7 million additional workers could be under-skilled for their job requirements^[1].

However, findings from the Department for Education's own [Employer Skills Survey](#), from the [CBI](#) and from organisations like the World Economic Forum all point to employers looking for skills like problem-solving, communication, self-management, team working, creativity, numeracy and digital skills. These essential, transferrable skills should be embedded throughout the curriculum and qualifications, rather than having them as standalone or external to the qualification.

¹ [Industrial strategy council, 2019](#)

Organisations such as the [Skills Builder Partnership](#) have developed a universal framework for essential skills which aim to support schools, employers and wider organisations to embed essential skills into the curriculum and workplace. The framework is now being used by 75% of UK secondary schools and colleges, 120+ employer partners and 170+ impact organisations.

For schools, the free toolkit breaks each essential skill down into teachable, learnable steps. We can learn from this model and understand how best to integrate essential skills across different subjects rather than in isolation.

Question 14:

- I. **Do you agree that we should fund level 1 pre-technical qualifications which focus on progression to level 2 and provide an introduction to the relevant occupational route?**

Yes, it is important to support progression from Level 1 to Level 2. Learners should be supported to develop a broad base of knowledge and skills at Level 1 before developing more specific skills and knowledge at Level 2.

However, there seems to be little mention of the importance of work experience at Level 1, compared to Level 2. We would strongly encourage work experience to be embedded within a Level 1 qualification, giving learners greater exposure to the world of work and an opportunity to develop transferrable, work-specific skills.

Question 19: Do you agree that the design and delivery principles outlined in paragraphs 150 to 155 will ensure that level 2 technical qualifications are accessible to adults?

The consultation rightly acknowledges the different circumstances that adults will face and that greater flexibility will be required for adult learners. Recognition of prior learning is a particularly important principle, and there are some good examples that we can learn from.

For example, [Graduate Apprenticeships](#) (GA) were launched in Scotland in 2017/28 and offer industry recognised and accredited apprenticeships, available from diploma qualification up to Master's level, with a unique blend of work-based employment and higher-level learning. Most importantly, the programme offers flexible entry and exit points, offering 'recognition of prior learning' (RPL) to take into account previous qualifications, skills and experiences. This offers an attractive option for new and existing employees, enabling those with relevant prior experience to complete the qualification more quickly.

GAs in Scotland offer a flexible and experiential learning experience. This is opening up opportunities to individuals from a range of different backgrounds, including older adults and those from under-represented groups. By catering for different learning styles, the flexible nature of the GA programme is playing an important role in supporting an increasingly diverse workforce.

Latest figures from the 2020/21 GA cohort saw dominant uptake among 25-34-year-olds ([SDS, 2021](#)), highlighting the appeal of GAs to those who may not have had the opportunity to study at degree level when they were younger, and the popularity of work-based learning as a means for up-skilling later in life.

Although Graduate Apprenticeships are offered at higher levels of study, the principles behind flexibility and RPL can still be applied to qualifications at Level 2 and below.

Question 32: Do you agree the national standards set out above will cover the range of skills needed by students? Do you believe there is a need to develop additional national standards? If so, please tell us what the standard should contain and which students it would benefit?

A national standard for Personal, Social and Employability (PSE) Qualifications would be beneficial if it leads to a higher quality of these qualifications. However, PSE skills are essential skills and as highlighted above, these skills should not be taught as standalone qualifications; instead they should be integrated throughout the broader learning experience.

Of course, supporting those with SEND, mental health issues, or from disadvantaged backgrounds to develop these skills is particularly important. But, we would not exclude these skills just to these students. The DfE's own call for evidence highlighted that employers particularly value these broad skillsets and often assess these skills through their own recruitment processes.

So we encourage PSE skills to be integrated earlier on in the school curriculum for all learners and to be embedded across the school curriculum. Again, the work of the [Skills Builder Partnership](#) can provide a helpful reference here.

Question 35: What support is needed to smooth the implementation of the proposed reforms to level 2 and below qualifications?

Government have still not published their list of which Level 2 qualifications are in/ out of scope of funding and until we see the full list of Level 2 qualifications, it is difficult for us to provide a rich response. So we urge Government to publish this list.

Funding must urgently be made available to support implementation. In recent years, Government halved the Adult Education Budget from £2.8 billion in 2011-12 to £1.5 billion in 2019-20^[2]. Funding rates per learner have also been frozen and funding for organisations such as local authorities and communities groups who would refer adults to basic provision has been reduced. We must urgently reverse this decline in funding in order to meet the scale of ambition. Otherwise the falls in funding, both per learner and overall, are likely to impact both on basic skills provision and participation.

The Education Sector has also experienced much flux over the years with constant policy churn and qualification reform. In addition, the Covid-19 pandemic seriously impacted the education sector with school and college closures, changes to the assessment system, the exacerbation of the digital divide and an unsustainable teaching workload. While we saw many in the sector demonstrate incredible resilience, there is much fatigue and a desire for greater stability.

It is also difficult to implement required reforms amid constant policy change. So Government must clearly establish its intended direction of travel, and commitment to funding. Government should then allow the sector to get on with delivery, without introducing yet more complexity and change to the system.

So we need government to listen closely, to act on the feedback provided, and to set clear, long-term direction moving forward.

² [Getting-the-basics-right-LW-report.pdf \(learningandwork.org.uk\)](#)