**Edge Response to post 16-qualification L3 review (second stage – 2020)**

It is right that government are consulting on the large number of post-16 qualifications and we broadly support government’s overall ambition to provide high quality routes for learners. The ambition that qualifications should reflect the key principles of purpose, necessity, quality and progression is particularly sensible and receives our support.

However, for a long time, policies have reinforced the binary routes between academic and vocational studies, and we feel strongly that young people should be able to combine academic and vocational education. So, this reform should not be about restricting choice, rather students should be made aware of the breadth of learning opportunities available to them post-16, enabling them to expand their horizons rather than restricting their options between a binary choice of T levels versus A levels.

Our major concern is that the current proposal risks undermining the overall ambition to streamline post-16 offers and improve quality because the ‘overlap criterion’ means many current standalone qualifications are at risk, regardless of their quality, take-up or support for progression. This will have knock-on implications for related Government policy priorities and reform initiatives in at least four key related areas, namely:

* Supporting employers to get the skills they need in a strong, balanced economy
* Ensuring vocational and academic routes are presented as equally valuable routes towards success
* Fostering informed and localised student and school choice; and
* Ensuring T-levels become a prestigious route of choice.

Instead, we recommend that Government hold all qualifications to the same high standards of the four ‘key principles’ [Purpose; Necessity; Quality; Progression] drawing on high quality insights about labour market relevance and other factors to remove funding on a case-by-case basis rather than with sweeping and simplistic rules.We want to avoid removing qualifications that have previously worked for many learners in the past.

Here we outline a modified approach which could better meet Government’s ambitions.

**RECOMMENDATION 1: The overlap criterion should be removed as this risks removing some qualifications which are already achieving strong labour market outcomes and support from employers. Instead, there should be a renewed emphasis on the four key principles to assess qualification suitability on a case-by-case basis.**

The intention that qualifications should reflect government’s four key principles of purpose, necessity, quality and progression are sensible and receive our support.

However, analysis highlighted in our **Example** below reveals that some existing qualifications that already have high levels of employer support and strong outcomes in the labour market, may be those that are seen to overlap with the proposed T-levels and A levels and may therefore be removed. By privileging whole routes of qualification (A-Levels and T-Levels) rather than evaluating qualifications individually against the principles, it is likely that some qualifications will be defunded despite being better than the ones which continue in their place.

Instead, if qualifications pass the four principles, we recommend retaining them, and allowing employers, students and providers to decide which ones best suit their specific needs in different circumstances. Attempts to define overlap precisely feel unnecessary – any suitable definition would be so exact that it would apply to scarcely any qualifications, needing to consider student preferences and strengths, different types of job role and career pathway, and employer needs.

If certain qualifications turn out to dominate others over time, for instance if T-Levels are a runaway success, then the proposal’s annual tests for low/no enrolment will automatically serve to simplify the system, while still retaining all qualifications that add value. However, the success of T levels are yet to be seen as the first round of T level students due to graduate in 2022 have not tested entry to labour markets or Higher education entry yet.

**Example:**

* McIntosh and Morris (2016) have demonstrated: *there is substantial variation in the estimated returns to vocational qualifications, across types of qualifications, levels, study subjects, and across points of the wage distribution.[[1]](#footnote-1)*
* For example, City and Guilds qualifications and BTECs currently deliver positive outcomes for learners. A review undertaken for BIS highlighted that for wage return at Level 3, gains appeared highest for City and Guilds qualifications, particularly for men (with a net benefit of £63,375-£93,973), closely followed by BTEC (£59,943-£74,423).[[2]](#footnote-2)
* Given that negative returns have been identified for A-levels in certain domains[[3]](#footnote-3), it is possible that the BTECs in those domains might be better than the A-levels, with respect to also being valued and rewarded by employers.
* There is evidence of support for applied general qualifications. For example, Ofqual’s 2019 annual survey[[4]](#footnote-4) found that employer stakeholders have a similar view on applied general qualifications to A-levels in terms of how well they prepare students for work (34% agreement for A-levels; 35% agreement for applied general qualifications). The same survey also found that young people were more positive on the work-relevance of applied general qualifications, with 47% agreeing that they are good preparation for work, compared to only 40% for A-levels.

Given the evidence above, we therefore believe the overlap criterion should be removed, in favour of a renewed emphasis on the four principles as a guiding principle. The conclusion is not to privilege alternative qualifications such as BTECs, City & Guilds or general qualifications over T levels or A-levels, but to evaluate each individually against the four key principles outlined in the consultation.

**RECOMMENDATION 2: Place weight on both employer perspectives and labour market outcomes in assessing qualification suitability**

We support a number of government initiatives that have been put into place to ensure the education system supports employer needs and contributes towards productivity – for example STEM inspiration activities led by BEIS, The Careers & Enterprise Company, using employers in the designing of T-levels among many others. We continue to advocate for the close involvement of employers, but this should be done where employers have a high level of expertise.

However, our concern with the current proposal is the risk of removing qualifications that are well-known, trusted by employers and that generate productivity benefits for employers (as highlighted in Recommendation 1). Certainly, low quality qualifications should be removed, but we believe the following steps should be taken to ensure employer perspective and labour market outcomes are considered when assessing qualifications on a case-by-case basis.

* Employer perspectives can be identified through structured surveys, focusing just on the domains in which those employers recruit.
* Labour market outcome analysis should be based on thorough, thoughtful and academically-compelling empirical analysis that takes full account of the choices available to individual students, their preferences, socio-economic background, prior attainment and careers guidance support.
* Qualifications should be assessed transparently, with published datasets on individual indicators, and using a team independent of Government to evaluate qualifications according to the criteria set by Government.
* It is better to take time over such assessments and get them right, than to take action based on inadequate empirical data.

**RECOMMENDATION 3: Avoid reinforcing the binary choice between academic and technical routes**

We are concerned that Government’s proposals re-inforce an unhelpful binary choice between academic and vocational routes and that the reforms will make it harder for students to take both academic and applied qualifications.

Government data from DfE in 2017 reveals 16.7% of students mixing academic level 3 qualifications with applied general or technical qualifications.[[5]](#footnote-5) However, the new T-level route is intended as distinct from A-levels with students in practice choosing one route or the other. This approach emphasises their differences, rather than the benefits of combining different types of learning and applying appropriate mixtures of skills and competencies in different jobs. It creates a dividing line between vocational and academic qualifications that does not reflect how qualifications translate into labour market practice and hinders efforts to break down barriers.

Instead, we would advocate for students to be made aware of the broader range of post-16 qualifications available such as BTECS, General qualifications, the International Baccalaureate, (among others) in addition to T-levels and A-levels. A blended learning approach may suit some students better and enable them to develop broader skills in both academic and vocational fields.

**RECOMMENDATION 4: Alongside this, we need to see enhanced investment in careers education and guidance**

The proposal here to dramatically reduce the range of options available to students post-16 contradicts and undermines policies based on informed choice. There is a valid claim that some qualification offers are confusing[[6]](#footnote-6) - but the solution to this lies less in arbitrarily removing options available, and far more in providing appropriate information, advice and guidance; with sufficient investment of time and expertise in understanding and exploring options. Students should also be made aware of further routes for progression including Levels 4-5, Degree Apprenticeships, Sandwich and Foundation courses in addition to the range of options at Higher Education. This would enable students to become aware of the options for greater flexibility (for example the opportunity to combine both education and work) and expose them to a broader range of choices.

Careers education and guidance still remains well below optimal levels. Instead, we need to see continuous and enhanced investment in independent careers education and guidance with a renewed commitment to integrating Gatsby benchmark 4. However, these benchmarks should not be a tick-box exercise; they should deliver meaningful and tailored activities. For example, including employer engagement and sufficient timetabled space (such as taster days, employer workshops and career talks) for young people earlier on in their school careers would enable them to understand the range of post-16 options available and therefore make the right choices for them.

1. McIntosh, S. and Morris, D. (2016). *Labour Market Returns to Vocational Qualifications in the Labour Force Survey.* London: CVER [↑](#footnote-ref-1)
2. Department for Business, Innovation and Skills. (2013). *Review of the Economic Benefits of Training and Qualifications, as Shown by Research Based on Cross-Sectional and Administrative Data (BIS Research Paper Number 105)*. [↑](#footnote-ref-2)
3. For instance, those taking 2 or fewer non-STEM A-levels saw wages 6% lower than relative to just having GCSEs – as reported in analysis for the DfE: Conlon, G. and Patrignani, P. (2015). *The earnings and employment returns to A levels - A report to the Department for Education.* London: London Economics. [↑](#footnote-ref-3)
4. Available from: <https://www.gov.uk/government/statistics/perceptions-of-a-levels-gcses-and-other-qualifications-wave-17> [↑](#footnote-ref-4)
5. Department for Education. (2018). Revised A level and other 16-18 results in England, 2016/2017 - SFR 03/2018, 25 January 2018. [↑](#footnote-ref-5)
6. For instance, the Moments of Choice research undertaken by the Behavioural Insights Team for The Careers & Enterprise Company. [↑](#footnote-ref-6)