

SUBMISSION

Education Select Committee: The Future of Post-16 Qualifications

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1. [MillionPlus](#) is the Association for Modern Universities, and the voice of 21st century higher education. We represent a range of higher education institutions across the UK¹ and have worked with the government to offer help and guidance in their development of a post-16 skills offer. Modern universities are at the forefront of blending academic, technical, and vocational courses for a million students around the UK. From educating the UK's public service workforce, to leading the sector on the degree apprenticeship agenda, to specialising in cutting-edge technical courses, the expertise and experience of modern universities will be critical in ensuring the post-16 offer is both open and transformative for all.
2. The government's commitment to boosting skills and investing in lifelong learning is very welcome. No matter how a person chooses to engage with education post-16, be that at a further education (FE) college or a university (or indeed both), it is vital that they are supported and given every opportunity to succeed. As part of the government's overall agenda, the Skills and Post-16 Education Bill does have much in it that can bring about positive change and speaks to some of what the sector has been calling for on both qualifications and beyond.
3. This submission highlights some of the areas where we believe the government are right to make changes, but also areas of some concern, such as potential unintended consequences of the planned reforms that need to be mitigated or addressed.

T LEVELS AND BTECS

4. The introduction of T Levels is, in principle, a positive step forward in recognising the value of technical courses and qualifications. MillionPlus has worked with the government to see how best these new qualifications can be integrated into the post-16 education landscape for maximum impact, however there are some challenges that need to be addressed in order for them to become a success, and an attractive proposition for all students.
5. One major issue with the current planned reforms has been the relationship between T Level and BTEC qualifications; with the original intention of government that one should simply replace the other, rendering BTECs unnecessary. It is hard to see which students would benefit from the removal of funding for BTEC and other applied general qualifications were this the direction of travel. While it is likely that many students will benefit from the introduction of T Levels, constricting the choice for students does nothing for the opportunities of young people in England. It would appear that the only real beneficiary of the removal of funding for BTEC qualifications is the government's own agenda on technical education, and its ability to demonstrate its performance in this regard. The government has previously shown its intent to create a situation where there is no other technical or vocational option at level 3 besides T Levels (except for apprenticeships). Such a move may well ensure that demand for T Levels is strong but it would do so by restricting choice, and choice for a qualification that suits very many

¹ <https://www.millionplus.ac.uk/about-us/members>

students in a way that T Levels may not. The recent decision to at least suspend the decision to remove funding from BTECs has been welcomed emphatically across the sector. It is encouraging to see that the Department for Education is seeking to be evidence-led and has listened to the widespread objections from the education sector to the withdrawal of funding for BTECs. However, there is some concern that this suspension of decision making might simply be kicking the can down the road. It is therefore important that continued pressure is maintained so that no necessary damage is inflicted on young people and their life chances at a later date..

6. The recent changes to T Level requirements regarding GCSE Maths and English are positive steps in ensuring access to level 3 qualifications remains open, however while this new policy is in its infancy it is important that other successful routes are maintained for those who need them. BTECs have played a critical role in widening access and participation into many communities and households that have traditionally been underserved by the education system. Students at MillionPlus institutions who are Black, from working-class backgrounds, or from low-participation neighbourhoods are all more likely to have taken BTECs and used them as part of their successful progression into higher education. While the prime minister has been explicit in his emphasis that this agenda is about prioritising the “other 50%” who do not go to university, it is unclear how any restriction of options at level 3 serves this cohort.
7. There is a logic to streamlining the qualifications available to young people to ensure they can optimise their choices. However, perhaps the greatest move in this direction would not be to restrict choice, but to improve the Information and Guidance (IAG) for people so that they can make the most informed choice, irrespective of the menu of options. Many young people are still making decisions on where their next steps might be while studying at level 3, and may not yet have a fully formed view of their direction of travel. BTECs have historically afforded a degree of flexibility in terms of their progression, most crucially because they can be combined with a mix of different types of qualifications and can accommodate a mix of different subjects. Early specialisation may be good for some young people through T Levels, but it certainly will not serve everybody, and the framing of this policy should be ‘what can we provide for these young people to invest in their futures?’, and not, ‘what can we take away to make things simpler?’
8. This early specialisation itself is also problematic, with the clear divergence between T Levels and A levels built into the government’s thinking on post-16 education. The Committee rightly highlights the importance of pursuing courses that blend academic and vocational education, and as highlighted previously, at university level many modern universities do this across a wide range of their courses. The problem inherent in the proposed model is the inability to access both A levels and T Levels for students, meaning that you are asked to choose which to pursue. While the government may hope that in the decades to come the divide between public perceptions of technical courses and academic courses are removed, there is a need to acknowledge that today some of the education system is not conducive to this change.
9. Schools are judged on how many of their pupils get into ‘highly selective’ universities², and it is this type of university that is the least likely to enable access through a T Level route. In effect, instead of creating a parity of esteem, or blending ideas of academic and technical, the government may end up reinforcing this binary, and arbitrary, divide. Furthermore, in many instances this represents a false dichotomy (many educational pathways are both academic and vocational). The government is already having trouble classifying what T Levels mean in terms of UCAS entry points, and universities themselves are in the early stages of properly incorporating them into entry criteria, a process that will be iterative. This level of uncertainty is likely to lead to T Levels serving a purpose of replacing some BTECs, but there seems little

² <https://www.compare-school-performance.service.gov.uk/>

evidence to suggest they will actually shift the prestige of technical and vocational qualifications. Indeed, the universities that have pioneered such blended approaches to these pathways, as modern universities have with degree apprenticeships (plus other routes), are the institutions routinely put down by the government as inferior, so it is very little wonder that such an image persists throughout the wider education sector and beyond.

SKILLS AND POST-16 EDUCATION BILL – MODULES AND LIFELONG LEARNING

10. Alongside T Levels, another critical element of the Bill that pertains to qualifications is around the proposed introduction of modular funding. MillionPlus has supported calls for a change to enable funding to be accessed in ways that are not solely linked to academic years, so the theory behind such a move is one that we support. However, the level of complexity behind this, and the necessary changes that would need to be made at all levels of the system, mean that such a change must be taken very carefully and deliberately.
11. Clearly, in a discussion on post-16 qualifications and their importance, the discussion around modular funding and lifelong learning, that may or may not lead to a qualification, is one that becomes more important. The government are right to push for better access to lifelong learning, and to enable students of all ages to access education and training in a way that best serves them. For some this may mean only accessing relevant modules to re-skill or up-skill for their work, and this education and training is highly likely to be necessary at all levels of education, from level 3 and beyond.
12. This new and innovative way of thinking about accessing education, which MillionPlus has supported for many years, comes into potential conflict with an agenda based on clearly defined qualifications and a focus on outcomes, as the two policy directions push in very different directions. It is therefore important to recognise that the post-16 qualification framework needs to be robust but also flexible enough to recognise that for some people the outcomes will not be the same as for others, and that the purpose of a given course may be very different for Student A and Student B. A simplistic pursuit of outcomes and a linear focus on qualifications may lead to the agenda on lifelong learning running aground, so it is important for policy makers to keep one eye on that agenda when developing a coherent post-16 education offer.

EMPLOYER VOICE AND THE WORLD OF WORK

13. A key concern for this policy agenda is the extent to which supply of qualifications and courses will be sufficient to support the demands of young people. Looking at T Levels firstly, the introduction of any qualification often sees teething problems in its roll-out and early implementation phase. There is simply no way of knowing for sure if T Levels will operate effectively across the board and at scale, which is why a phased approach adopted by the government to introduce T Levels allows a more iterative process where issues can be identified along the way without having widespread impact. This will generate some insights into “what works” in the case of T Levels. However, there will still be unknowns, since the challenges and issues could vary considerably from one occupational route to another.
14. The early stages of the phased approach also tell us little about the capacity of T Levels to operate at scale. The government is expecting T Levels, an as yet unproven qualification, to essentially replace BTECs and applied generals. This requires T Levels to generate a significant level of supply on a national scale. One major issue in relation to supply is that of placements. T Level students are expected to complete a placement as part of their qualification (minimum 45 days), but placements with employers are notoriously difficult to secure for pupils/students. There are serious questions over whether there is

enough capacity in the system to provide placements for students once T Levels are operating at full-scale across all 15 occupational routes.³

15. Research commissioned by the DfE has shown that some providers in the early roll-outs have struggled due to: "... the limited size of the local labour market; internal staffing and capacity issues; lack of relevant employers; and issues with transportation and placement accessibility". Moreover, when surveyed, at least 70% of T Level providers described the process of securing placements as "difficult or very difficult" in the following routes: Digital; Creative and Design; Construction; Engineering and Manufacturing.⁴ In short there are some concerns over supply-side issues of T Levels and the ability to scale these up on a national level. The point about the local labour market also suggests that any issues related to this might develop unevenly across the country, which would be a significant barrier to the government's ambition to 'level up' the country.
16. MillionPlus has long-standing reservations about the 15 occupational routes that underpin the government's technical education approach. The concern is that these occupational maps might be too rigid to adequately support individuals through the economy of the 21st century, where the labour market is likely to undergo significant evolution as technology and automation change how and where we work. Most young people today are likely to have multiple different career changes throughout the course of their lifetime. MillionPlus has previously expressed these concerns in consultations and meetings with officials on the subject of technical education. While we accept that the occupational routes are a feature of the system as designed, it would be sensible to keep their utility under review, to ensure the system speaks to the idea of the "future economy" that was the focus of so much of this reform agenda.
17. Modern universities work closely with many employers in their regions on a number of different fronts, and this includes working with them to inform the curriculum of certain courses, particularly those with a vocational focus. As such, it is in the interest of employers that there is a broad range of qualifications at level 3 in England that can support progression to higher education, be that at level 4, 5 or 6, within an apprenticeship or a more traditionally academic form of study.
18. It is crucial to ensure that employers remain a key part of the process when designing courses, and as we have stated removing BTEC qualifications is not in the interest of employers, limiting as it does the choices for many young people and potentially limiting progression pathways which can enhance employability. This applies to any student who might be thinking about doing (or would have done) a BTEC, but is most acute for those types of students who would normally combine BTEC study with A levels.
19. A much better situation would be a scenario in which the government's new suite of technical qualifications (T Levels & apprenticeships) sit alongside A levels and BTECs so that the maximum choice and opportunity is afforded to people in England. This is what will support the needs of employers in the coming years.
20. Degree apprenticeships are an excellent example of how employer voice can be part of the system, but also an example of how too rigid a structure and too inflexible a set of criteria mean that the take-off of the policy is stymied. Many MillionPlus members have pioneered work on the degree apprenticeship

³ <https://www.tes.com/news/t-levels-industry-placement-challenge-requires-robust-response>

⁴ Department for Education (2020) Process Evaluation of support for T Level Industry Placements

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/916867/Process_evaluation_of_support_for_T_Level_Industry_Placements.pdf

agenda, indeed 59% of universities on the apprenticeship training provider register are modern universities.⁵

POST-QUALIFICATION ADMISSIONS (PQA)

21. In principle, there are advantages to a PQA system, as it could provide applicants with more information prior to decision making. However, it is important to note that PQA is not a 'silver bullet' and should not be seen as an end in itself. There has been debate over the actual evidence base for the assumptions that are baked into any move to PQA being better for students, and the sector would benefit from having the government work with it to analyse this evidence base before making such a move.⁶
22. Notwithstanding this discussion, however any new system would be implemented is a vital consideration that bears further thought. It needs to be one that works effectively for all potential applicants and doesn't simply replace old advantages for some applicants with new advantages for others. It would also need to be undertaken with timetables for both schools and universities firmly in mind – as examiners need time to mark work prior to grading and pupils also need enough time to assess their options and research potential destinations.
23. There is also a major issue with PQA as is currently being described, relating to its application to the whole of the UK. The system currently is managed by UCAS, and is therefore UK-wide, and open to all candidates and higher education institutions in all four nations. There is long-standing respect for the UK higher education sector, which has a strong global reputation, and extreme care must be taken before any one nation takes a unilateral approach to changes such as PQA. It is also vital that changes based on the needs of English applicants and providers do not damage the experiences of applicants and providers in Scotland, Wales or Northern Ireland.
24. MillionPlus represents all seven of the modern universities in Scotland, and consequently has a particular interest in how this affects the country. The models that have been put forward in the 2021 DfE consultation on PQA were designed primarily with the A level timetable in mind, looking at how to reduce complexity for these students. There is a risk that the proposals could actually increase complexity for those applying with Scottish qualifications, or applying from a Scottish college. The challenges with regard to start date of the new academic year are perhaps even more acute for Scottish applicants and Scottish institutions. Different systems are in place in England and Scotland with respect to the allocation of places and number controls. The extra pressure created for admissions staff at universities will manifest differently north and south of the border. Some consideration therefore needs to be given to striking a balance between the effects of any new admissions model across the whole of the United Kingdom.

⁵ https://www.millionplus.ac.uk/documents/Jul21_ThinkModern_StatsBooklet_LR.pdf

⁶ https://www.hepi.ac.uk/wp-content/uploads/2021/03/Where-next-for-university-admissions_Hepi-Report-136_FINAL2.pdf (p55)