

UCU response to the DfE review of post-16 qualifications L3 and below

June 2019

Annex A: List of consultation questions

Principles – Purpose and necessity

p.17 How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer? Please give reasons for your answer, including any examples of how this may be achieved.

UCU believes young people need a curriculum to give them the knowledge and skills required to enable them to fulfil their talents and aptitudes in further learning and employment, and as an engaged member of society. This must have as its foundation a high quality education delivered through a range of academic and practical or applied learning modes. The learning undertaken from age 16-18 is a key phase in the transition to adulthood, however not all young people will have a clear idea during this phase of where they would like to progress to next. It is vital that their education choices at this stage remain broad and flexible to support a range of outcomes. Because of this we are wary of specifying particular outcomes to particular qualifications. Narrowing down the options available to young people in the assumption they will follow a linear progression route they embark upon at age 16 is to misunderstand the context in which many young people are living and learning.

p. 18 Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.

Yes. Whilst these types of qualifications may not be linked with direct labour market or higher study outcomes they have an important role in engaging young people and adults who may not otherwise undertake any kind of learning. For those who have been demotivated or alienated by previous learning experiences these qualifications offer an opportunity to re-engage with education. For some SEND learners they also present an opportunity to achieve a qualification which they may not otherwise be able to do.

Principles - Progression

p. 19 What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?

There needs to be greater recognition that not every learner will progress in a neat, linear fashion. UCU advocates broad progression outcomes, tailored to the needs of the individual learner. The system that we have, increasingly assessed with high stakes examinations, means that fewer learners are able to progress because they do not make the cut. Institutions are incentivised to exclude those who don't perform as well in examinations, there are not clear routes for those that need extra time to meet the required standards to progress to the next level (indeed the funding available actively discriminates against those that take an extra year of study and those who are learning at lower levels), and government policy, couched in the language of rigour, focuses on an elite portion of young people neglecting the needs of middle attainers.

The system needs to support progression more inclusively, with contextual outcomes that support the individual aspirations and abilities of the learner. The missing voice in this consultation is of learners themselves. Young people and adults may have different motivations and end goals for their learning, but equally they are not homogenous groups and cover a diverse range of individuals. Only by understanding what learners want from their education, and what they want to achieve, are we going to be able to begin to recognise successful outcomes.

P.20 How could we better use data about student outcomes to monitor and assess the success of future qualifications?

UCU would urge caution in linking student outcomes to the 'success' of future qualifications. Young people's destinations are difficult to track because their progression is often not linear or sustained. Precisely because they are young and often do not have pre-determined outcomes in mind, there is likely to be a high number who change their plans for reasons unrelated to the qualification they have taken. Outcomes also depend upon variable factors such as geographic location, local labour markets, access to education institutions, family circumstances, health conditions or financial considerations. If we want to improve student outcomes, it would be far better to focus on addressing these barriers rather than changing qualifications without addressing the underlying reasons why students may not achieve positive outcomes.

Principles – Quality

p. 22 Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.

We have an independent regulator, Ofqual, that maintains standards of qualifications in England. UCU would consider any qualification that has been approved by Ofqual to be of high quality. Factors that affect the delivery of the qualification - such as funding and investment, accountability and assessment - can contribute to, or detract from, the quality of teaching and learning and thus the quality of experience that taking the qualification provides.

p. 22 Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.

UCU doesn't believe that quality features can be considered in isolation. For instance, a larger qualification in terms of glh will not translate into a quality education if that increase in size is not properly funded. Similarly approaches to assessment should not be one-size fits all. Different qualifications rightly will have different assessment methods that are appropriate to that qualification, therefore the assessment method cannot be viewed as an indication of quality of itself.

p.22 Are there particular quality principles that we should consider for adults? Please give reasons for your answer.

Applying our principles – Our broader ambitions

p.24 At level 3, what purposes should qualifications other than T Levels or A Levels serve: a) for 16 to 19 year olds? Please give reasons for your answer.

UCU rejects the notion that all young people will be served by either T Levels, A Levels or apprenticeships. Firstly, the proportion of apprentices in this age range is incredibly small. Employers on the whole find employing this age group as apprentices incredibly unattractive. Most young people will therefore be learning in school sixth forms, sixth form college or general FE colleges rather than in work based learning.

Secondly T Levels haven't even started being taught yet, and will only have a very limited reach geographically and in terms of subjects in their first few years. So to question the purpose at this stage of established, popular and well-understood applied general qualifications seems at best premature and at worst perverse. T Levels also have a number of different components that must be successfully completed to pass, which favours students studying full-time without interruption. SEND learners, or those with caring responsibilities for example, may need to study part-time or flexibly and so encounter more barriers to completing the T Level.

Finally, many students who study A Levels also take a mix of other qualification types. This enables them to study qualifications that fit with their capabilities and aptitudes, is an important facet of widening participation, and has been a feature of our education system for some time. Furthermore it is not clear that all subject areas will be covered by A Levels

or T Levels (for instance performing arts subjects) and so there has to be another route to qualification.

It is critical that to serve all young people, and not just a minority, we maintain a broad range of options and qualifications; and this means continuing to provide applied general qualifications.

b) for adults? Please give reasons for your answer.

Adults enter education for diverse and multiple reasons. We should therefore not be prescriptive about the choice of qualifications available to them at any level – this means a broad and comprehensive offer must be maintained.

p.24 How should we determine “overlap” in relation to:

a) overlaps with T Levels? Please give reasons for your answer.

b) overlaps with A Levels? Please give reasons for your answer.

Whatever the definition, UCU does not agree that any qualification that overlaps with T Levels or A Levels should automatically not be funded. As set out above, a diverse range of qualifications is necessary to serve the needs of the whole cohort rather than a minority.

p.24 How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?

One positive innovation with the introduction of T Levels was the transition year for students needing an extra year to complete the programme. Although details of what the transition year will fully entail are not yet available, UCU would support the principle of a transition year being introduced for all level 3 programmes for those students who would benefit. This would also require reversing the funding cut for 18 year olds.

p.25 How could post-16 qualification reform and broader study best support more people to achieve at level 3?

See answer above. We would also point out that increasing the base funding rate across the board is well overdue, particularly if we are making more demands of 16-18 year olds with broader study programme requirements and larger qualifications. At the moment a higher funding rate is proposed for T Levels which is

Teacher pay in the FE sector has fallen behind their equivalents in schools significantly, and the workforce is heavily casualised. Addressing these workforce issues and better funding the sector will lead to higher quality teaching and learning and thus better achievements. More generally allowing teachers to teach a creative curriculum that engages students and is tailored to their needs will support achievement.

p.26 If level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice.

Level 2 qualifications should not be 'intended' for any one particular purpose. Level 2 qualifications should be broad enough in scope to lead to further study at the same or higher level, employment or work based training. The important principle is provide all level 2 students with a broad, high quality education that will give them the basis to move onto whatever they wish to do.

p.26 What are the key roles that qualifications at level 1 and below need to play?

Level 1 and entry level qualifications may be an end in themselves, or provide opportunities to engage with further learning or entry to employment. They are a crucial part of engaging learners who may not otherwise participate in any form of learning.

p. 27 Are there additional principles we should apply to level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.

Securing early progress

p.31 Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer.

p.32 Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.

UCU believes that awarding bodies are best placed to comment on this.

p.32 Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer.

UCU believes that awarding bodies are best placed to comment on this.

p.33 Do you agree we should consider removing approval for funding from qualifications with low enrolments? Please give reasons for your answer.

By their nature, specialist and niche qualifications are likely to have low enrolments. This does not mean they are not valuable or worthy of public funding.

p.33 Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.

Shaping the next stages of the review

p.35 Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND or others with a protected characteristic under the Equality Act 2010? Please give reasons for your answer.

UCU has already outlined some concerns in the answers to other questions. We would add that there is already an attainment gap for disadvantaged learners, which providers are held accountable for. Pastoral support and access funding have been cut due to the chronic underfunding of education because of austerity. The department should consider very carefully the impact of moving toward a more rigid system of post-16 qualifications which encourages selection by ability, and demands more of learners and teachers without supporting the sector with additional funding.

p.35 Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation? Please give details of any additional impacts below.

The second stage consultation must include learner voice, staff voice and provider voice. The department must make a concerted effort to reach out to all those who will be affected by any change. Furthermore the department must consider the impact on students seeking entry to higher education – so admissions staff must be consulted; and to employment, so employers too must be a part of the process.