

Capital City College Group's response to the [review of post-16 qualifications at level 3 in England: second stage consultation](#)

Level 3 qualifications for 16 to 19 year olds	
6.	Do you agree that the two groups of qualifications outlined in paragraph 45 are needed for 16 to 19 year-olds choosing technical provision?
	<p>No.</p> <p>While Capital City College Group welcomes the proposal for high quality technical qualifications other than T-Levels, we do not understand why this should come at the expense of the current applied general qualifications (AGQs), including BTECs, which can still play a vital role in the education of our young people. We are concerned about giving students a narrow – essentially binary – choice and disagree with the proposal that T levels and A levels should become the “programmes of choice for 16 to 19 year olds taking Level 3 qualifications”.</p> <p>We also welcome the proposal for additional specialist qualifications, although students are unlikely to be able to study these as well as a T-Level, as this is a very substantial full-time programme. Also, these should not be limited to students studying T-Levels and should be available to all level 3 students.</p> <p>The design principles, size and content for any new qualifications will need to be consulted on widely to ensure they meet student as well as employer needs. We also feel they should be co-designed by educators and employers and others, and we have misgivings about the process for designing some T-levels (see 8. below).</p>
7.	Do you agree with the funding criteria described in paragraph 47 for the other technical qualifications we propose to fund for 16 to 19 year olds (qualifications providing occupational competence against employer-led standards which are not covered by T-Levels and additional specialist qualifications)?
	<p>No.</p> <p>We agree with the Association of Colleges that these criteria are too restrictive and may rule out useful qualifications which do not map closely to a specific employer standard, cover narrower occupational requirements, may partially overlap with T-Level specifications or could be regarded as an alternative to an apprenticeship.</p> <p>It is also unclear whether it is The Institute or Ofqual which will have the determining say in approving these qualifications.</p>
8.	Should the Institute create additional T-Levels for pathways or occupations featured on the occupational maps? If so, please indicate the pathway(s) / occupation(s) and explain why.
	<p>Yes.</p> <p>Sectors which should be considered include Sport, Travel and Tourism, Performing Arts, Music performance, Public Services and some aspects of Art and Design. Our three colleges (City & Islington, Westminster Kingsway and the College of Haringey, Enfield and North East London all run all the above courses between them, which are major employers and of value to the UK economy.</p> <p>However, we have concerns about the way that some T-Levels are being specified and designed. For example, Westminster Kingsway College is home to one of the UK's leading hospitality training schools (it trained Jamie Oliver, Ainsley Harriott and many other leading chefs), but it – and as far as we can tell no other college – has been enabled to participate in the design process for the Catering and Hospitality T-Level. If this is being replicated across other T-Levels, the vital input of educators</p>

	(who will be delivering the qualifications and will to a large degree be responsible for their success) will be missing.
9.	Do you agree with our approach to removing funding approval for qualifications that overlap with T-Levels, described in paragraphs 52 to 66? Are there any other factors we should consider when deciding whether a qualification overlaps with T-Levels?
	<p>No.</p> <p>The GCSE grades that students must achieve before they can study A-Levels or T-Levels are higher than the entry bar for the BECs and AGQs. A binary choice between A-Levels and T-Levels will mean that thousands of students (possibly 50,000 per year according to the Association of Colleges have to take GCSE maths and /or English resits.</p> <p>We do not see 'overlap' between qualifications as being a problem. If 'overlap' is interpreted as the same subject content appearing in different qualifications, it can contribute to the integrity and coherence of each qualification and enhance students' access to key content. Qualifications may differ in size and smaller qualifications may overlap with larger ones. They may also differ in learning approaches, breadth of content and how the content is presented. Different types of qualification may have overlapping content while playing to students' different aptitudes. Some students respond well and flourish in the context of reading text and producing written work, others to more dialogic, teamwork and practical activity.</p> <p>We have concerns about the proposal to remove funding from one set of successful qualifications before their proposed replacement is available and has been tested in real educational settings. The proposed timeframe is too ambitious and will not enable successful transition to T-Levels for those colleges offering them for the first time in 2023. We would also recommend that each qualification and/or sector be reviewed on a case-by-case basis.</p>
10.	Do you agree that the types of small qualifications described in paragraphs 71 to 73, that should typically be taken alongside A levels, should be funded?
	<p>Yes.</p> <p>We welcome the recognition that A-Levels alone do not cover all the skills, knowledge and understanding needed for every student to thrive in HE and, while we support the proposal to fund small qualifications to be taken alongside A-Levels, we are concerned:</p> <ol style="list-style-type: none"> 1. about the expectation that students will take these courses alongside an (academically demanding) A-Level, when they may not have the skills to do that; 2. about the future of existing Level 3 extended diploma courses. For example, we have students on a variety of performing arts Level 3 extended diplomas, in acting, dance, musical theatre and production arts. These are high-quality qualifications validated by the University of the Arts, London (UAL) and are been designed to provide the skills, knowledge and understanding necessary to progress to degree-level study in performing arts, or into employment. 3. that the range of these additional qualifications is too narrow and we do not agree that funding should necessarily be withdrawn from non-A Level qualifications in Business or Science, as this could limit opportunities for students.
11.	Do you agree with our proposal that performing arts graded qualifications, core maths, advanced extension awards and Extended Project qualifications should continue to be funded?
	Yes.

	<p>Core maths and the Extended Project Qualification are valuable qualifications which can enhance the study programme of students studying at level 3 regardless of their main studies. Entries for the advanced extension award are very low and their purpose and design would benefit from being reviewed.</p>
12.	Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?
	No
13.	Do you agree that the group of qualifications described in paragraphs 79 to 80 should be funded to be taken as alternative programmes of study to A levels?
	<p>Yes.</p> <p>The criteria for these should not be framed too narrowly or limited to performing arts or sports and the a 'large qualification that aims to be an applied version of A Levels' may have value in the system. We would caution against withdrawing funding from qualifications before a clear replacement is widely available which is demonstrably more effective in preparing for progression and promoting success, inclusion and social mobility. It is important that any qualifications funded in this category have status and longevity and are not seen as 'second class'.</p> <p>We also think that the option of 'recoupling' AS achievement to A2 grades should be restored in order to recognise and value the achievements of first year A Level students who then progress to A2 in the same subject.</p>
14.	Do you agree with our proposal the IB Diploma should continue to be funded?
	Yes.
15.	Do our proposals for academic qualifications for 16 to 19 year olds (set out in paragraphs 67 to 82) provide opportunities to progress to a broad range of high quality higher education?
	<p>No.</p> <p>We have reservations about applying excessively narrow criteria for both 'alongside' and 'additional' qualifications. See our comments above. Applied General and Tech. level qualifications prepare students for progression and contribute to social cohesion and social mobility. In many cases, students underperformed at secondary school and came to the college with low motivation and expectations, and it was their attendance on a performing arts course which gave them renewed confidence in themselves and their abilities and enabled them to succeed in their other studies.</p> <p>BTEC qualifications are a vital and valuable route into higher education and employment – especially for students who do not have a foundation of success at earlier years in the UK – perhaps because they did badly at school or came to the UK in their teenage years (perhaps as refugees).</p> <p>For example, one particular Westminster Kingsway student came to the UK from Bulgaria aged 15 in 2017 with such poor English that she couldn't order a McDonald's. But in just two years, she not only adapted to the UK education system, but mastered English to the extent that she achieved top grades in her Science – Level 3 Extended Diploma, which set her up for university and ultimately a job in any number of scientific or research fields, including as a Biological scientist, biochemist, chemical scientist or a laboratory technician.</p> <p>Students achieving first degrees coming from the BTEC route are on average 20% more likely to be BAME, have 30% lower GCSE point scores at 16, are over 3.5 times more likely to have SEND and over 2.5 times more likely to have been eligible for free school meals – making the current applied general qualifications a great tool for social equality and 'levelling-up' the economy.</p>

Supporting students to attain the new high quality offer	
16.	What additional support might students need to achieve the new high quality offer at level 3
	<p>A funded high quality Personal and Social Development programme should be available for students at all levels as part of an entitlement to a strong common core for all 16 to 18-year-olds.</p> <p>All study programmes from Key Stage 3 onwards need to be accessible to the full range of students working at this level, the majority of whom will enter college with a GCSE between grade 3 and 6. To support more people to achieve Level 3 qualifications, assessment will need to be appropriate for a wide range of students including those who have not flourished or achieved their potential in Key Stage 4. Study programmes should have a core component of high-quality careers education, information, advice and guidance to help young people make fully informed choices about their progression options, as well as coaching and assessment in the soft skills (eg: collaboration, teamwork, independent thinking, self-awareness, communication, resilience and adaptability), valued by both university admissions teams and employers.</p> <p>Study programmes at level 3 Assessment needs to be practical and skills-based to meet the needs of employers. There need to be frequent windows for assessment re-sit opportunities which do not prevent students from progressing. Young people mature and make careers choices at different rates and there should be opportunities for all learners, including adults, to re-enter education; either part time or full time, on a college-based or a work-based route.</p> <p>The availability of work placements will have an impact on what programmes can be offered and even when they are available, if organised in blocks, this may deter students who depend on other employment for their income.</p>
17.	What additional support might SEND students need to achieve the new high quality offer at level 3?
	<p>We welcome the proposals for a robust PSHE programme for students with SEND. This is something which should be available to all learners. This will help to address the needs of the increasing number of students with social, emotional and mental health needs.</p> <p>The flexibility for students with Education and Health Care (EHC) plans to be able to access this offer with Entry level 3 English and maths should be extended to all students with SEND, including those without an EHC plan, in line with ongoing discussion between DfE and the SEND specialists at T-Level SEND meetings.</p>
18.	Are there level 3 qualifications that serve the needs of SEND students that cannot be met by the proposed qualification groups in the new 16 to 19 landscape?
	See our responses to question 16 above and our comments throughout about the qualification landscape at level 3.
Supporting adults	
19.	Do you agree with our proposal to fund the same academic options for adults as 16 to 19 year-olds?
	<p>Yes.</p> <p>Post-16 students of all ages should have access to the same qualification options and colleges cannot be expected to run parallel provision in the same sector for adults and young people if this implies unviable group sizes.</p>

	This recommendation should be implemented as soon as possible.
20.	Do you agree with our proposal to fund the Access to HE Diploma for adults (as well as for 16 to 19 year-olds in exceptional circumstances)?
	Yes.
21.	Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?
	<p>Yes. The ability to accredit prior learning in a flexible way is also particularly appropriate for adults. Size and duration are key design features and adults require a more flexible or modular offer due to work or family commitments and other personal circumstances.</p> <p>The issue of cost is very pertinent too. In 2017, one of our colleges (CONEL) made all courses from Entry Level up to and including Level 2 free to all applicants, and enrolments skyrocketed and have stayed high ever since. For many learners, the cost of their chosen course was the only barrier to them enrolling, so making it free unlocked their learning. For many adults, a free course is just the start - nearly half of our learners have used their free course as a springboard for higher level courses. The recent further education white paper proposes making students take out a loan for learning, instead of making courses free at the point of delivery. However, the idea of taking a loan is very unattractive to many people and would choke demand for courses which is the opposite of what the Government intend. We would urge you not to do this.</p>
22.	Do you agree with our proposed approach to making T-Levels available to adults?
	<p>Yes. This will support the necessary flexibility required to meet the range of adult needs, and T-Levels may particularly suit younger adults. The case for a more modular approach is not only based on flexibility in delivery. This can also be justified on pedagogical and motivational grounds and these also apply to younger students.</p>
23.	Do you agree with our proposal that T-Level Occupational Specialisms should be offered as separate standalone qualifications for adults?
	<p>Yes. This is a welcome proposal, and we would suggest that bridging and transition programmes should also be available to adults. This opportunity to be accredited for T-Level Occupational Specialisms would also be beneficial for younger students.</p>
24.	Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?
	<p>Yes. Two of our three colleges run Level 3 Teaching Assistant and Level 3 Association of Accounting Technicians AAT and these are particularly valuable qualifications.</p>
25.	What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116 above)?
Ensuring qualifications are high quality	
26.	Do you agree with our proposed approach to reforming technical qualifications?
	No.

	<p>We have reservations as outlined in our responses to questions 6-9 above. The definition of the two routes is still too restrictive and falls short of meeting the needs of all students at level 3 and will reduce choice, narrow opportunities and throw social inclusion and mobility into reverse. Colleges and many universities and employers value the reformed Applied General Qualifications and these have played a major role in widening participation and supporting progression.</p> <p>Both routes need to have high status while also being more inclusive and flexible. Vocational programmes which allow for delayed specialisation and include shorter qualifications should be available, either as part of a 'general / academic' route or a 'technical / vocational' route. Colleges have expressed concern that T-Levels will not be able to meet the needs of all students currently studying on Level 3 vocational programmes.</p>
<p>27.</p>	<p>Is there anything else we should consider when implementing our proposed approach?</p>
	<p>We feel there needs to be greater clarity on the respective roles of the Institute and Ofqual in regulating qualifications designed for similar purposes. Also, more thought must be given to the process for designing and quality-assuring T-Levels (see 8 above).</p>
<p>28.</p>	<p>Do you agree with the proposed approach to qualifications in apprenticeship standards?</p>
	<p>No.</p> <p>The approach as described could potentially create issues if this process occurs in advance of the apprenticeship standard review cycle. It will be important to ensure that the employer groups involved in apprenticeship standard review are aware of this wider review. They should be encouraged to imagine the delivery of the standard without the existing mandated qualification, this in turn should add an increased importance to the EPA (which can be undermined by the existence of licence to practise' qualifications that employers continue to recognise).</p> <p>This assumes that the government wishes to pursue the policy that puts EPA as the recognised route to full competence. Having said this, such qualifications provide routes to competence that sit outside apprenticeships which we need to ensure remain as we have recently seen how sensitive apprenticeships are to shifts in the economy. We must have credible routes to competence that don't rely so significantly on the availability of a job within which to learn, that will provide colleges the opportunity to provide effective progression training when the economy is restricted. What is needed is more flexibility in delivery towards common assessment/outcomes.</p>
<p>29.</p>	<p>Do you agree with our proposed approach to reforming academic qualifications?</p>
	<p>No.</p> <p>We have major reservations, as we've outlined in our responses to questions 10-15 above.</p>
<p>30.</p>	<p>Is there anything else we should consider when implementing our proposed approach?</p>
	<p>Qualifications cannot always aim to lead directly to a clearly defined outcome. High quality qualifications can serve more than one purpose and in practice, the qualification market, the labour market and individual learner journeys cannot provide uniform or linear routes. Young people in particular change their minds about progression routes and intended occupations. Many higher education programmes and job roles, for example, will accept a range of different qualifications as entry requirements.</p>

	<p>The post 16 system is inclusive and promotes social cohesion and mobility by providing opportunities for a wide range of students. Not to do so could see an increase in the number of students not in Education, Employment or Training (NEET). Colleges are very committed to 'getting it right' for our learners but the wrong kind of system change can create a risk to our students of 'not getting it right' and jeopardizing their achievement and progression opportunities. This can have serious economic and human costs. However well designed the system, there must be opportunities for young people to change pathway with help and support available to facilitate this. The lack of such opportunities will lead to greater student disengagement and drop out.</p>
<p>Delivery process and timetable</p>	
<p>31.</p>	<p>What support is needed to smooth the implementation of the proposed reforms?</p>
	<p>We are concerned about our capacity, because of the pace of change and the current level of base funding.</p> <p>The impact on providers of repeated, consecutive changes will have implications for staff workload and morale at a time of financial pressure and as our colleges and staff recover from the COVID pandemic has major for their staff.</p> <p>Consideration needs to be given to the impact of withdrawing some qualifications on the ability of a provider to deliver other qualifications. For example, withdrawing qualifications in sport, public services and performing arts could impact so negatively on the viability of a college that it might need to stop providing other qualifications.</p> <p>Given the timetable for T-Level roll-out and the number of providers involved, not all providers will have experienced the curriculum and culture change by the time these reforms are implemented.</p> <p>The level of investment in T-Levels and the Transition programme needs to grow as enrolments grow, there needs to be greater investment in staff development and college collaboration as well as concerted support for the development of dual professionalism in the FE workforce.</p> <p>There also needs to be continued investment in employer engagement at scale to meet the demand for placements across the country.</p>