

Full OCR response to DfE review of post-16 qualifications at level 3 in England: second stage

The following responses were submitted via the on-line response form.

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?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Qualifications providing occupational competence against employer-led standards which are not covered by T Levels

- 6.1. It will be necessary to fund qualifications which cover areas where there is a need for training in sectors or occupational areas not covered by an existing T Level - it seems likely that there will be an economic need and demand from learners for courses outside those sectors covered by T Levels and there should certainly be contingencies in place to cover such a scenario.
- 6.2. We assume that the term 'employer-led standards' is intended to mean standards developed under the supervision of the Institute for Apprenticeships and Technical Education (although this term is barely used on the relevant government websites). However, there are many other potential sources of employer standards including, for example, those developed by professional bodies, those drawn up between awarding bodies in partnership with employers, and standards developed internationally by employers and governments.
- 6.3. The proposal refers to qualifications providing occupational competence. We think what is actually being referred to are qualifications that provide threshold or entry level competence¹. Occupational competence is more likely to be delivered through apprenticeship programmes, which do not usually involve the achievement of qualifications.
- 6.4. See also our response to question 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

Additional specialist qualifications

There can be no fundamental basis for opposing the funding of additional specialisms, but caution should be exercised because:

¹ In previous consultations about the design of T Levels we have challenged the concept of threshold, or as it is now expressed, entry level competence. Competence can be demonstrated in a whole variety of skills and tasks so we think it more helpful to make a distinction between competence and work-based competence.

- 6.5. T Level programmes are already designed as full-time programmes and to layer an additional specialism on top of the existing one(s) would be very demanding on the student and the college
- 6.6. One of the reasons there are currently so many technical qualifications is due to the coverage of the many different specialisms and contexts that exist. If the system is to be simple to manage and understand, the proliferation of specialisms in 16-19 pathways should be treated with restraint.
- 6.7. The technical route already squeezes the opportunity for wider curriculum activities and an additional component would make the problem more acute. 16-19 year olds are part of compulsory education and the state has a duty to provide them with PSHE, including support in such areas as mental health, and life skills such as financial management, along with a broader appreciation of civic and cultural society and the arts. These broader, 'general' learning activities are a mandatory feature of the German Dual System – a previous failure to pay enough attention to general education in the technical route was cited as one of causes of the 'Pisa Shock'.²
- 6.8. As breadth is at least as important as specialisation, then it could be argued that an AS in an arts subject, or an A Level in maths might be more appropriate than further specialisation.
- 6.9. Elsewhere in our response we highlight the global trend towards deferred specialisation – young people will have time to specialise as they continue their training post 19.
- 6.10. It isn't clear what types of specialisation would fit with this proposal, but clearly, in many cases, specialisation would come as part of the next phase of learning and will, by definition, be available at a limited number of specialist institutions. The example given in the consultation of 'marine engineering' within a T Level programme, given the limited curriculum time, could be little more than a taster, perhaps for a degree or other post 19 course such as ship science – see below

From the University of Southampton public website:

Ship science covers all aspects of maritime engineering, including the design, construction and testing of the vessels and offshore structures that use the ocean for transport, recreation and the harnessing of marine resources.

Our courses will equip you with the skills to design analyse and manufacture the largest and most complex vessels in the field of engineering operating in one of the most extreme environments on this planet.

- *Get hands-on experience in extensive specialist facilities like the largest university towing tank in the UK*
- *You'll learn from the best as we have over 50 years of teaching Ship Science*
- *Your degree is designed to support the aspirations of the UK's Maritime 2050 strategy*
- *Learn from engineers from the internationally-renowned Wolfson Unit and Lloyd's Register*
- *100% of Ship Science students were satisfied or very satisfied with the overall quality of their course**
- *96% of Ship Science graduates were in employment or further study 15 months after graduation*

https://www.southampton.ac.uk/engineering/undergraduate/courses/ship-science.page?utm_medium=cpc&utm_source=google&utm_content=marine%20engineering%20degree&utm_value=&gclid=EA1aIQobChMIjJu23ezP7QIVbIBQBh0uXA-rEAAYASAAEgLAIPD_BwE

² www.oecd.org/about/impact/germanyspisashock.htm

It should be noted that Applied General Qualifications as well as A Levels are cited as being recognised as facilitating entry to this course.

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)?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Our answers to question 6 already cover some wider points about what needs to be taken into consideration when approving qualifications in these categories, but, in summary, they are:

- 7.1. Potential impact on the clarity and simplicity of the system over all (given the stated priority to rationalise the existing system)
- 7.2. Potential impact on coherence and manageability of existing programmes – particularly T Levels
- 7.3. The capacity of providers to deliver specialisms and the subsequent impact on availability
- 7.4. The extent to which additional specialisation for 16-19 year olds is either necessary or desirable
- 7.5. Duplication – whether the sector or occupation is already provided for in other routes or, more appropriately, in post 19 education
- 7.6. Whether the proposed qualification is deemed a priority in a system with limited capacity

Although these relate to the four headings of Purpose, Progression, Necessity and Quality, they also refer to issues of policy, prioritisation and system-wide implications which should be acknowledged explicitly in any approach to the funding of 16-19 qualifications.

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.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Our understanding is that one of the functions of IfATE is to consult and recommend answers to this question. It is not possible to rule out every argument for additional pathways that might

arise in the future. However, new pathways should only be created where there is a clear rationale. The Sainsbury Review was thorough in drawing up its occupational pathways (see below) and we would expect a similarly rigorous methodology to be applied to the creation of any new pathways. There will undoubtedly be some need for revisions following the impact of the pandemic which will not have been taken into account in the original Working Futures data that was used in the Sainsbury Review.³

From Annex B of the Sainsbury Review in which it sets out the process by which the current pathways were arrived at.

This annex sets out the analysis undertaken to support the development of the proposed technical education routes. Labour market data were used to formulate the routes, and a number of analytical checks were applied to ensure the proposed routes would meet the principles agreed for the reforms. The various analytical stages of the routes development are outlined below and summarised in this annex:

- *using Standard Occupational Classification (SOC) 2010 codes to produce initial occupational groupings which could be refined into effective technical education routes*
 - *testing the routes for alignment against apprenticeship standards, tech levels and technical certificates*
 - *testing the homogeneity of skills and knowledge requirements between occupations within routes, using the United States occupational database, O*NET*
 - *testing the industry coverage the routes provide, using industry-level labour market data and Standard Industrial Classification (SIC) codes*
 - *testing the future viability of the routes using the UK Commission for Employment and Skills (UKCES) Working Futures data*
- The supporting analysis outlined above formed only one strand of a broader process for reaching the proposals. Alongside the analysis, there has also been extensive engagement with stakeholders such as employers, academics and professional bodies.*

As with vocational qualifications or A Levels, it isn't possible to agree what the optimum number of T Levels or apprenticeships should be, but we would caution against exponential growth. According to the DfE's own website there are currently 595⁴ approved apprenticeship standards (across all levels), although the Open University has projected that 1,600⁵ is likely to be closer to the final number created. Current plans anticipate that there will be 25⁶ T Level pathways across the existing 14 sectors. It is interesting to compare this with Germany, where there are currently around 330⁷ occupations requiring formal training in its Dual System, covering 7 sectors, defined as follows: Industry and Trade, Crafts, Public Service, Agriculture, Professions, Home Economics, and Maritime⁸. The title 'Dual System' in Germany specifically refers to its apprenticeship system (the duality being work-based and classroom based learning) and should not be confused with the 'two track system' referred to in the minister's introduction to this consultation.

Occupational standards, whatever their origin, need to be reviewed regularly to allow for changes in technology and working practices, and they also need to be evaluated, with

³ Neugart and Schoemann (2002) suggest that predictions have some value (e.g. Sexton, 2002; Barnow, 2002) but are misused if they're seen as precise tools. Instead forecasts should be seen as enabling a "more strategic approach to identifying and subsequently solving problems" (i.e. we should expect less of our models).

⁴ <https://www.instituteforapprenticeships.org/apprenticeship-standards/?includeApprovedForDelivery=true>

⁵ <http://www.open.ac.uk/business/apprenticeships/blog/what-are-apprenticeship-standards#:~:text=As%20a%20result%2C%20apprenticeship%20standards,as%201%2C600%20standards%20by%202020.>

⁶ <https://www.gov.uk/guidance/t-levels-next-steps-for-providers#:~:text=There%20are%2025%20T%20Levels,surveying%20and%20planning%20for%20construction>

⁷ <https://www.bmbf.de/en/the-german-vocational-training-system-2129.html>

⁸ https://www.cedefop.europa.eu/files/4184_en.pdf

users, for their quality and functionality. It is important, therefore, that IfATE can manage any expansion in the range of pathways and occupations it creates. It is also important that decisions about any expansion in pathways is decided in conjunction with all relevant stakeholders. The quality of standards must be such that they can provide safe foundations for new qualifications. It was the Sainsbury Review that stated: “some existing apprenticeship standards, at least at face value, seem to overlap significantly with others, be firm- rather than occupation-specific, and/or contain insufficient technical content. If this is indeed the case, it risks a proliferation of low-value or niche standards, creating complexity and recreating all the problems of the previous system”.⁹

There will be times when employers and training providers will have to adapt quickly to changing circumstances and requirements. Even the leanest and most efficient of government bodies will struggle to respond quickly and innovatively to such circumstances and to absorb any associated risks. This is a general point, but in relation to this question, it seems likely that IfATE would struggle to develop new approaches (which might not involve T Levels at all) at the pace that might be required. Traditionally, HEIs working directly with employers have been the main source of responsiveness and innovation which plays to a later point about the importance of HEIs in higher level technical education.

We accept that government has taken a policy decision to move towards a more European-style ‘planned economy’ by which to manage its skills system. However, we would recommend reserving some funding models and associated approaches to technical training which would allow for rapid change and different approaches, particularly in response to the economic impact of the pandemic, but also as a response to Brexit and, of course, to the implications of the global climate emergency.

The international ascendancy of the ‘British approach’ to skills development

It has to be taken into account that most countries favour flexible training and retraining concepts that are modelled along the lines of the British approach that emerged in the 1980s (Jessup, 1991). The British approach was designed to tackle the problem of the dwindling importance of company-based training, which lost sway against academic pathways and direct entry into employment

Deissinger, Thomas. (2015). The German dual vocational education and training system as 'good practice'?. *Local Economy*. 30. 557-567. 10.1177/0269094215589311.

The popularity of the British model has been amply demonstrated by its success in exporting education and training across the world. According to the DfE report, *UK revenue from education related exports and transnational education activity in 2017*, education and training exports were worth **£21.4 billion in 2017**.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/850263/SFR_Education_Exports_2017_FINAL.pdf

9

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/536046/Report_of_the_Independent_Panel_on_Technical_Education.pdf

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?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

- 9.1. The removal of funding from existing qualifications needs to be carefully managed. Existing, well established qualifications with high levels of employer recognition and strong market value should not be withdrawn, if at all, until T Levels are widely available and recognised. A withdrawal of such qualifications ahead of the full availability of relevant T Levels would create a serious hiatus of provision and could lead to a rush to deliver T Levels from institutions which have yet to develop the networks and infrastructure required of them. The DfE is on record as describing the introduction of T Levels as a ten-year programme and we strongly support such a cautious approach. There is a real risk, highlighted in the DfE's own risk analysis of a significant body of students, for whom an A Level or T Level programme is not appropriate or available, becoming NEET.
- 9.2. Caution and stability are vital - anything which undermines the reputation of new qualifications such as T Levels can be extremely damaging. Past experiences with government-developed qualifications such as GNVQs, NVQs, 14-19 Diplomas have illustrated how vulnerable such qualifications are at their point of introduction and how, often unfairly, public confidence in them can evaporate.
- 9.3. It is also important not to 'rubbish' existing qualifications as 'low quality' or of little value when this is patently untrue, especially at a time when these qualifications are still being funded. Learners should have the qualifications they are taking treated with respect and their recognition in the marketplace should not be undermined, even if notice has been served on their being funded in the future. Where qualifications are to have their funding withdrawn a long period of notice (at least three years) would be required to allow colleges and schools to prepare.

Para 54, page 25 of the consultation states 'we will remove funding approval from these qualifications in 2023'. But at the top of page 14, it states that qualifications will be withdrawn 'from' 2023. We hope that the latter, i.e. the use of 'from', is what was intended as it provides some flexibility and control to government and its agencies in rolling out what are probably the biggest changes to vocational education since the introduction of BTECs in 1974. Some flexibility may also be required to adjust to the considerable impact of Covid on schools and colleges and on the needs of the wider economy. We support, at the very least, the assertion in Ofqual's response to this consultation (para 4) which asks the DfE to "consider whether there are aspects of the proposed reforms for which implementation could be delayed by a year".

Youth Commission of the Learning and Work Institute report and the importance of expanding level 3 provision

The final report of the Youth Commission of the Learning and Work Institute, “Unleashing talent: levelling up opportunity for young people,” (Galliers, King and Maher, 2020), makes a number of important recommendations for level 3 study that partly counter the direction of travel implied by this consultation. It highlights that in order to tackle youth unemployment and low pay, the number of young people qualified to level 3 must increase – they argue for 75% attainment of level 3 by 2030. (By contrast, the impact assessment attached to this consultation highlights the risk that these reforms could *diminish* the number of young people attaining level 3. Impacts on the number of people with NEET status, those unable to escape low-paid work and so on are likely results of this.) Again, great caution should be taken when considering removing funding for existing level 3 qualifications and/or replacing them with T Levels.

These proposals will actually reduce the available number of Level 3 qualifications by 62%, according to the DfE’s accompanying impact assessment.

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?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Academic qualifications taken alongside A levels and AS levels

10.1. Applied General Qualifications provide a strong blend of the academic and the practical and therefore provide an important enhancement to the academic pathway. The importance of these vocational qualifications in addressing skills shortages should not be underestimated. These qualifications develop skills which are highly prized by HEIs and employers alike. During the reforms of the A and AS Levels, HEIs fed back their concerns, time and again that the reduction in coursework and the emphasis on examined content would lead to a diminution in skills such as: independent learning, research, risk taking, resilience, critical thinking and the application of theory to knowledge. This is in addition to the specific sector based skills and knowledge which these qualifications provide as preparation for specific vocational degree courses.

The skills deficit found in many newly recruited undergraduates – an issue that can be addressed in part by applied general qualifications

“Most lecturers think that academic writing, self-directed study, independent inquiry and research, and critical thinking skills are weaknesses of typical undergraduates when they begin degree level study.”

From: What are the impacts of qualifications for 16 to 19 year olds on higher education? A survey of 633 university lecturers Conducted as part of the HE Engagement Research Programme Irenka Suto April 2012

Skills of applied general students and labour market skills shortages

- The work of Greatorex and Suto (2016), on establishing a harmonised taxonomy of the domains of knowledge covered in qualifications and levels of mental processing required to answer questions, has been used by OCR to demonstrate that Cambridge Technicals¹⁰ test non-cognitive domain skills (21st century skills) including high-order decision-making, critical thinking, collaboration and communication
- Cambridge Technicals fit well into areas seen as having skills shortages. For example, the DfE's Employer Skills Survey 2019 highlights that Business Services and Health and Social Work had the most skills-shortage vacancies (pre-pandemic).
- In the same report, while the majority of vacancies were attributed to candidates not having the appropriate skills or knowledge, "complex analytical skills", time management and self-management skills were the next most frequently lacking sets of skills – these can be seen to be assessed within Cambridge Technicals.
- Dickerson and Morris (2019) similarly find increasing use over time of analytical and interpersonal skills, and these are pervasive throughout employment situations. They also highlight the positive returns to these skills, and negative returns to physical skills
- Cedefop forecasts (2018) highlight that business and personal care are two sectors likely to see the most job openings to 2030 requiring medium or high level qualifications. In addition, the demand for high and medium qualified workers is likely to exceed supply
- Similar themes are evident in the World Economic Forum's Future of Jobs report (2020)

Implication Although recent government policy on technical education has emphasised a perceived lack of *technical skilled workers and technical knowledge*, and hence may be seen to justify a focus on T levels, most other sources highlight either a) that great skills shortages exist in sectors such as social care too – where communication skills, empathy and so on matter hugely – and/or b) that the changes being wrought upon the economy by both the pandemic and automation are likely to lead to workers over the next ten years having to retrain frequently. Consequently it could be argued that specific technical knowledge is not what (much of) the economy requires, but instead qualifications which produce creative, collaborative, critical and empathetic thinkers are likely to be more useful – applied general qualifications such as Cambridge Technicals can fulfil this role.

10.2. WonkHE and Adobe have published a joint report out about skills that academics in HE think graduates need after HE (<https://wonkhe.com/blogs/skills-to-thrive-academics-perceptions-of-student-skills-development/>). While less directly relevant to post-16, as this is about skills to be developed *during* HE courses, findings point to the importance of soft skills such as communication, problem-solving and critical thinking which feature strongly in applied general qualifications. This again points away from the current policy focus on "hard" technical skills.

10.3. A model which blends vocational and general subjects is not unique to the UK. Germany, in recent years has seen the emergence and growth of post 16 institutions routes that combine general and vocational education (e.g. Berufskollegen), as well as opportunities for blended learning and transition programmes.

"The central importance of the vocational college (Berufskolleg) lies in the combination of general and vocational education. It therefore enables simultaneous qualification in vocational and general education, which is implemented differently in the various courses of study."

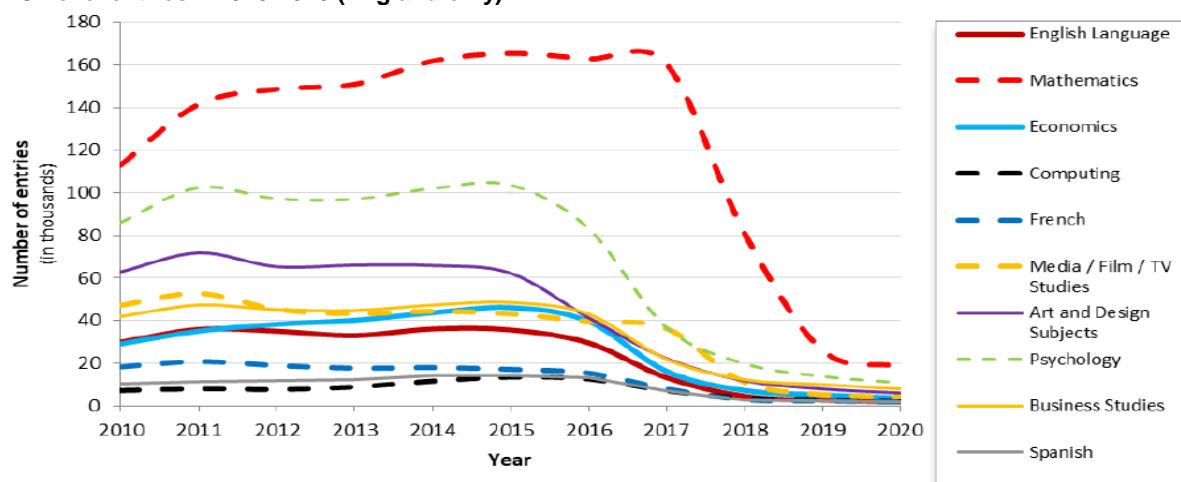
<https://www.researchgate.net/publication/281424181> The German dual vocational education and training system as 'good practice'

¹⁰ OCR's Cambridge Technicals are the fastest growing 3 qualifications designated by the DfE as Applied General qualifications, typically taken in combination with A Levels.

- 10.4. Paragraph 68 refers to A Levels as having been ‘recently reformed’. They were reformed for first teaching from 2015 onwards and in a normal cycle (we accept that the last year has been far from normal) these reforms would already be subject to an extensive evaluation with a view to making decisions about when and what future revisions might be required. A review of A Levels is particularly important in order to test whether some of the concerns of higher education about the reduction in coursework have turned out to be well-founded. To review general vocational qualifications taken in the academic route without at least some consideration of the future direction of A Levels would be unwise. Instead we should be thinking ahead to a ‘reform moment’ when the demands on the curriculum are likely to change (e.g. greater emphasis on climate change, concerns about diversity) as well as the inevitable impact of technology on what is assessed and how it is assessed. The disruption to education caused by the pandemic has also triggered a debate about which aspects of the curriculum are deemed to be the most essential and some questioning of the resilience of existing established assessment models.
- 10.5. It will also be important in any evaluation of the reforms to look at the performance of A Levels in vocational subjects, such as Business Studies which may be perceived as overlapping with vocational qualifications. Many schools and colleges have told us they prefer the vocational ‘alternatives’ which are able to include more practical and skills-based activities. If such overlapping qualifications are to be withdrawn it will be necessary to evaluate whether the remaining A Level is fit for purpose or whether the assessment model should be revised. Although, on the face of it, A level design requirements are largely dependent on external exams as the mode of assessment, this requirement has been reduced or waived altogether for some A Level subjects, such as Art and Design. To remove an ‘overlapping’ vocational qualification would not be enough without also including a review of the equivalent A Level and the appropriateness of its assessment model. We offer some further thoughts on the issue of overlap later in our response to this question.
- 10.6. It is worth noting that OCR halted the development of its A Level in Health and Social Care part way through the last reforms. It was felt that the content was too theoretical and lacked a skills focus, which could be better assessed within a vocational qualification. Applied Generals in Health and Social Care are widely recognised by HEIs as part of the access requirements for nursing and other degree courses.
- 10.7. Perhaps the most dysfunctional part of the current academic route is the AS. A number of subjects at AS have already been discontinued. There is a need to review the impact of the disappearance of AS which was an unintended consequence of the reforms. There is some evidence that the demise of AS, as anticipated in the OCR/NUS report published ahead of the reforms¹¹, is having a disproportionately negative impact on learners who are already disadvantaged. It may be proven that less confident learners who would once have embarked on an AS are now best served by applied generals. The graph below demonstrates the decline in AS uptake powerfully:

¹¹ <https://www.timeshighereducation.com/a-level-reforms-graded-f-by-students/2013663.article>

AS Level entries – 2010-2020 (England only)



Source – JCQ

10.8. Applied general qualifications were subject to substantial revision in 2016 and to further reforms to the structure in 2018. The reformed versions, described by the DfE as ‘more rigorous’, allow far greater control over grade inflation and feature more external assessment and greater ‘synopticity’ than previously. They perform well alongside A Levels in terms of demand as our results from 2018/19 for Cambridge Technicals show:

Level 3 Cambridge Technicals 2018/2019

1. 98.7% achievement rate compared with A Level achievement at 97.6%
2. 71% achieving D* - M compared to 78.4% A*-C at A Level
3. 9% of learners achieved D*

The DfE on Applied General Qualifications “– these are rigorous advanced (level 3) qualifications that equip students with transferable knowledge and skills. They are for post-16 students wanting to continue their education through applied learning. They fulfil entry requirements for a range of higher education courses, either by meeting entry requirements in their own right or being accepted alongside and adding value to other qualifications at the same level.”

From: Vocational qualifications for 16 to 19 year olds 2017 and 2018 performance tables: technical guidance for awarding organisations.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/546044/16-19_qualifications_technical_guide_2017_and_2018_performance_tables.pdf

10.9. Paragraph 71 of the consultation states “We expect that these qualifications would be small in size, meaning **at most** equivalent to one A level in the number of guided learning hours.” Although we agree that the majority of qualifications in the academic pathway should be equivalent in size to an A Level, it is not entirely clear why the concept of a ‘double award’ at 720 GLH, for example, is ruled out from the outset. For this reason we prefer the wording used in paragraph 75 “**typically equivalent in size** to an A or AS level”. Our most popular 720 GLH Cambridge Technical is in Health and Social Care and is typically taken alongside Biology A Level to lead to a degree in nursing, or alongside A Level Sociology to lead to a degree in social work. There are strong arguments for retaining this route.

10.10. In our response to phase one of this consultation we drew attention to the fact that in most high performing jurisdictions there is trend towards delaying specialised study until the post 19 education phase. This mirrors a rise in the school leaving age. Professor Alison Wolf described this in her landmark report on vocational education (see below). This underscores why it is important to provide opportunities to study sectors without opting for a full-time technical route at 16.

The case for delayed specialisation

Extending the common core: the trend to delayed specialisation

Over the last quarter-century there has been a marked increase, throughout the developed world, in the proportions of young people completing a full secondary education (up to the point of tertiary education entry. This is normally referred to as completing ‘upper secondary’ education, but in England, the term upper secondary is sometimes used to refer to KS4). The increase has been strongly encouraged by governments, many of whom have aimed to have the overwhelming majority of a cohort graduate with an upper secondary (age 18) certificate which gives access to tertiary studies. (Examples include Sweden and France.) As discussed in the main report, it has also been a response to families’ own desire for extended opportunities and growing aspirations for higher education. **The result has been to delay specialisation in the secondary curricula of almost all developed countries.**

Review of Vocational Education – The Wolf Report , Alison Wolf, March 2011, p174

- 10.11. There are dangers in producing a system which commits young people at 16 to a binary choice between employment or university. One danger is ‘tracking’ - see the comments below from Andreas Schleicher on the challenges of tracking in the German system

The issue of ‘tracking’

[Andreas Schleicher, director for education and skills of the OECD] said Germany needs to do more to open pathways to higher education for students pursuing vocational education and training. “On paper, the qualifications system is open. In practice, not too many people are using the pathway from vocational to higher education,” he said. “The possibilities are there. But the problem there is that tracking in Germany starts so early, once you are in the vocational track you don’t have a mindset for going into academic studies... More has to be done to create more flexible pathways throughout the entire system.”

<http://ncee.org/2017/09/after-the-shock-the-german-education-system-in-2017/> Bob Rothman

Branding and organisation of the academic pathway

The term ‘academic’ may have a tendency to reinforce unhelpful stereotypes and create a very narrow expectation of what might be taken in combination with A Levels. Providing the message is clear that the primary purpose of qualifications in this route is to prepare students for higher education, we wondered whether some wider work on branding this route would be advisable. The views of young people and parents should be taken into account when arriving at a final nomenclature.

According to this consultation, there are 555 ‘recently reformed’ A and AS Levels There are 138 Applied General Qualifications. And yet it is those qualifications which we are describing as applied generals which are not always widely understood and recognised. We recommended in our response to the previous consultation that some thought should be given to how vocational qualifications in academic pathway should be branded, or, at least, given an umbrella term that helps with recognition.

We would also argue that the excellent work of awarding organisation and Ofqual on strengthening vocational qualifications, especially those featuring in performance tables, should continue with a view to moving us even further to common regulatory requirements so that the features and design of these qualifications are even more uniform.

There is an important place for diversity of approaches in vocational qualifications, but we believe that those taken at 16-19 and used for performance tables should be taken closer into the regulatory fold. The need for this was evidenced by some of the difficulties in finding shared solutions for arriving at grades for applied general qualifications during the ongoing pandemic.

Some further thoughts on overlap

As a general point, and one acknowledged in this consultation, attempts to quantify the amount of overlapping content between qualifications is fraught with difficulty, constitutes time-consuming, detailed work and is more of an art than a science. Although content may appear similar, it will often be taught and assessed in quite different contexts. There may, for example, be an overlap in human biology between an A Level in Biology and an Applied General in Sport – but the Sport qualification will go on to apply that similar knowledge to a very specific context. Sometimes there are good reasons for overlap – the A Level science subjects have a consistent approach to defining the mathematics that is required across each of the sciences – an arbitrary rule on overlap should not deter an awarding organisation from taking a similar approach, with a requirement for similar mathematical content in, say, a vocational qualification for Laboratory Technicians that is a feature of the science A Levels.

Where there is deemed to be overlap between two qualifications there would need to be a clear rationale as to why this is undesirable and no automatic assumption, that the A Level is more fit for purpose than an Applied General that covers the same ground. Performing Arts is a case in point where qualifications that are not A Levels covering this subject area are often preferred by employers and universities alike. Given the strength of the contribution of the creative arts to the UK economy, this would need to be treated with great care.

We welcome the statement in Para 76 that overlap will be permitted in qualifications “*when there is evidence that they will provide breadth or depth in practical or performance skills*”, although we do not support the argument that this should be the *only* reason for allowing overlap.

It is also important that the process adopted for determining overlap is transparent, justifiable and conducted by a range of people with the appropriate expertise. Cambridge Assessment has developed a rigorous process for measuring overlap between cognate subjects – see below.

Best practice on comparing qualifications

Cambridge Assessment has a rich tradition of research-led analysis and evaluation, and this includes considerable work on the best ways to compare qualifications. Qualifications should be compared according to clear criteria, using defined research instruments, in relation to appropriate metrics, and by reference to well-theorised assessment and curriculum models. Qualifications can be compared at the student level, using, for example, measures of prior outcomes, concurrent outcomes or future outcomes to assess the equivalency of standards. Or they can be compared at specification level, to assess whether their content, and what is required of candidates, is comparable. Research instruments can be either statistical or based on expert judgement, or both. To determine whether qualifications are comparable, it is necessary to consider the similarity or otherwise of their purposes (both explicit and implicit), the content they cover, their assessment forms, the nature of their candidatures and other factors; all of these should be clearly defined.

For instance, four research studies took place in 2020, assessing overlap in the domains of knowledge, content and skills covered by OCR A levels and Cambridge Technicals in cognate subjects. In these studies, researchers coded learning outcomes statements and assessment materials according to a harmonised taxonomy of both the domains of knowledge and skills intended to be covered by the qualifications, and the levels of mental processing required by candidates to answer particular items in their assessment. This taxonomy (Greatorex and Suto, 2016, drawing on, inter alia, Marzano and Kendall, 2007 and Hutchins, 2013) was developed for comparability purposes, and has been used in a variety of research exercises since. These studies highlighted areas of greater and lesser overlap (at unit and component level) between the pairs of qualifications, and in both content/skills and assessment requirements terms.

Other, related, research instruments used for assessing the validity of qualifications at Cambridge Assessment (e.g. Shaw, Crisp and Johnson, 2011) involve setting out a list of potential inferences that can be made about candidates with particular qualifications, and then gathering statistical and judgemental evidence in relation to each potential inference.

Following established, appropriate procedures such as these, researchers can gain a richer understanding of the ways in which qualifications challenge candidates and what candidates who have studied them are able to do.

Given these factors, it is important that the process adopted for determining overlap between the qualifications under consideration here, and both A levels and T levels, is transparent, justifiable and conducted by a range of people with the appropriate expertise.

Funding criteria

There are no questions in this consultation about the proposed funding criteria featured in paragraphs 75-77, other than on the issue of overlap but we thought it important to include some important considerations on some of the funding criteria as they are set out.

The purpose criterion uses a metric that risks not commanding confidence. While ensuring that qualifications enable progression to high quality higher education is of course essential, the definition laid out in the consultation – that is, that there is:

- “evidence that high quality HE providers (those with
 - high completion rates and
 - progression rates into further study or employment
 - and which meet the Office for Students’ (OFS) other quality-related conditions of registration)

- consider the qualification would enable entry to a course
- in a related subject at their institution”

is not necessarily suitable.

It is not clear that “high completion rates” is straightforwardly a mark of quality. As argued by a recent HEPI report (Hillman, 2021) ¹² “there is no consensus on important issues, such as what an acceptable non-continuation rate is, whether it is damaging for individuals to leave a course before the original learning objective is met and how policymakers should respond to the issue.” Far from being unacceptably low, UK HE’s completion rates are so high, compared to international comparators that arguably the country is taking “insufficient risks in terms of who it enrolls in higher education.” People may leave courses early for perfectly good reasons – personal or otherwise.

Moreover, there may be risks for access and widening participation if only universities with the highest completion rates are permitted to sponsor qualifications in the manner suggested above. This is because institutions with potentially lower completion rates may be those who tend to serve higher percentages of marginalised populations such as BAME learners, part-time learners, commuter learners and so on (indeed, groups that can be seen as being served better by blended level 3 learning, rather than all A levels). “Progression rates into further study or employment”, for similar reasons, may be problematic, while the data that underlies such metrics have particular, specific weaknesses, and are also weaker when aggregated (see Hayes, Machin and Spendlove, 2020 ¹³; Kernohan, 2020 ¹⁴).

It is also unclear why the definition of high quality is taken at provider level. It may be that a university offers a very highly regarded human biology programme, say, where other provision in different subjects is less well viewed; it is not clear why course leaders on that biology programme should be excluded from sponsoring qualifications in this way.

That qualifications may only be sponsored if they are considered to enable entry to courses in “a related subject” is likely to lead to problems defining “related,” particularly if such definitions are based on the *names* of qualifications and courses. Qualifications may offer skills and knowledge that are relevant across a broad range of higher education courses.

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?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

¹² <https://www.hepi.ac.uk/wp-content/uploads/2021/01/A-short-guide-to-non-continuation-in-UK-universities.pdf>

¹³ <https://www.hepi.ac.uk/2020/06/17/inaccurate-graduate-employment-data-helps-no-one/>

¹⁴ <https://wonkhe.com/blogs/the-further-adventures-of-the-uks-worst-higher-education-courses/>

Yes. This supports the argument for qualifications with practical or performance skills being made available alongside A levels. We are strong supporters of the extended project and core maths. Both could easily be branded as types of applied general qualifications. The non-examined, project-based nature of the Extended Project qualification mirrors the design and function of the project-based elements of many applied general qualifications. EPQ works well as one option for providing breadth and practical components to an academic curriculum. but it should be noted that over the last three years the numbers of young people entering for the EPQ has dropped year on year.

Subject	% change	2019 Number of entries	2020 Number of entries
Extended Project	-7.2	38,852	36,056

We are also strong supporters of the core maths qualifications – which again have a practical, applied approach, featuring a strong element of coursework. The uptake of core maths has and continues to be disappointingly low¹⁵ and there has been considerable research into the reasons for this. Opportunities for students to develop strong applied mathematical skills must also continue to be available within vocational qualifications in, for example, in engineering.

12. Are there any other types of qualifications that we should continue to fund to be taken alongside A levels?

No, although the need for new qualifications in this space should not be ruled out.

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?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

We support this proposal although we are not sure that such HE courses should be limited to ones described as ‘specialist’. What would need to be demonstrated, rather, is that the full time 16-19 programme had been tailored to provide preparation to a *specific* HE course or a group of courses which share similar content.

¹⁵ Report: <https://coremathsproject.leeds.ac.uk/final-project-report/>

14. Do you agree with our proposal the IB Diploma should continue to be funded?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Agree, although we have some reservations about the availability and therefore accessibility of the IB to all potential students. We also note that some of the other proposals in the consultation limit the scope for centres and students to create their own blended programmes which can offer a similar combination of advantages to the IB.

15. Do our proposals for academic qualifications for 16 to 19 year olds (set out in paragraphs 67-82) provide opportunities to progress to a broad range of high quality higher education?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

- 15.1. We have worked closely with the HE sector to make sure that our Cambridge Technicals mirror their requirements. Our developers worked directly with a range of universities including: University of Leeds, University of Brighton, London South Bank University, Coventry University and Birmingham University. We have consulted with our Higher Education Forum throughout which includes members from the majority of the Russell group universities and the full range of other institutions. They are all telling us that Applied Generals work for them and are widely used to facilitate entry to their degree courses
- 15.2. The examples of combinations of vocational and A Level study in paragraph 72 provide clear examples of how a blended approach can be used to create a programme tailored for a specific degree subject. They are compelling and resemble some of the case studies provided in our response to phase one of this consultation. We would strongly argue, however, that an academic programme made up of general vocational and A Level subjects need not necessarily be tailored for a single destination, nor should the vocational element have to be tied to the precise subject to be studied at degree level. Qualifications develop generic skills which can be applied across a range of employment settings – essay subjects develop report writing skills, performing arts qualifications can develop communication skills, many graduates in sport subjects are recruited for their skills in sales. Just as someone studying History is more likely to become an accountant than a historian, it would be wrong to assume that all applied generals should result in a student following a single employment route.

Case study – mixed provision.

In 2017, Ollie and Jake became the first two students to go to Cambridge University with Cambridge Technicals. They achieved great results across a range of A Levels in Maths and Physics, combined with Cambridge Technicals in Engineering.

The combination of good A Levels and a Cambridge Technical helped to make their applications to Cambridge distinctive with a balance of strong academic and more practical achievements.

Case studies – how Cambridge Technicals are supporting development and helping people to find their true vocation

Jas was convinced that she wanted to be a teacher when she started college. She kept her options open though and took a number of Applied General subjects at Level 3, including a Cambridge Technical, and is now training to be a paramedic. Tim came to college with several grade C GCSEs. He was interested in nursing but not certain of his career route. His Level 3 study transformed his aspirations and he went on to graduate with a first in adult nursing, having made choices along the way based on his placements. He then undertook an MSC and has now qualified as a Physician's associate. The Applied General options allowed both students to aspire and achieve.

Case study – meet James Rawlin, Rail Bridge Engineer

For most Engineering jobs I would recommend studying Maths and Physics A Levels alongside the Engineering diploma at the UTC, as this worked well for me. However, it's a good idea to research the different Engineering sectors to have a clearer idea about what skills are more suited to your preferred sector. For example, the world is becoming more digital and needs more Software Engineers, so if you're interested in learning about software development or coding then other A Levels may be better suited alongside the diploma. It's a challenging subject but it's provided me with lots of valuable knowledge and transferable skills that I'm excited to develop further in my career.

For a full account of James' progression journey, see:

<https://www.utcsheffield.org.uk/city/news/2021/01/06/meet-our-alumni-graduate-rail-bridge-engineer-james-rawlin/>

- 15.3. Having flexible/balanced qualifications on entry to higher education through a mix of academic and vocational/applied allows for easier and potentially more options around transfer decision making (in year 1 of HE degree programme) as opposed to a less flexible/balanced entry profile.
- 15.4. Whilst we support part of the argument set out in paragraph 77: "We recognise that some of these qualifications may overlap with T Levels because they are specifically designed to support progression to an HE course in a related subject, rather than aimed at developing occupational competence". We would reiterate the point that progression to HE doesn't have to be tied to the vocational subject taken as part of a blended level 3 programme.

HEI progression and OCR Cambridge Technicals

Cambridge Assessment is in the process of analysing UCAS data (using 2019/20 UCAS data) on HE progression for Level 3 Cambridge Technicals. There is good progression to university and, since 2017, the number of candidates with Cambridge Technicals applying to study higher education courses has been steadily increasing.

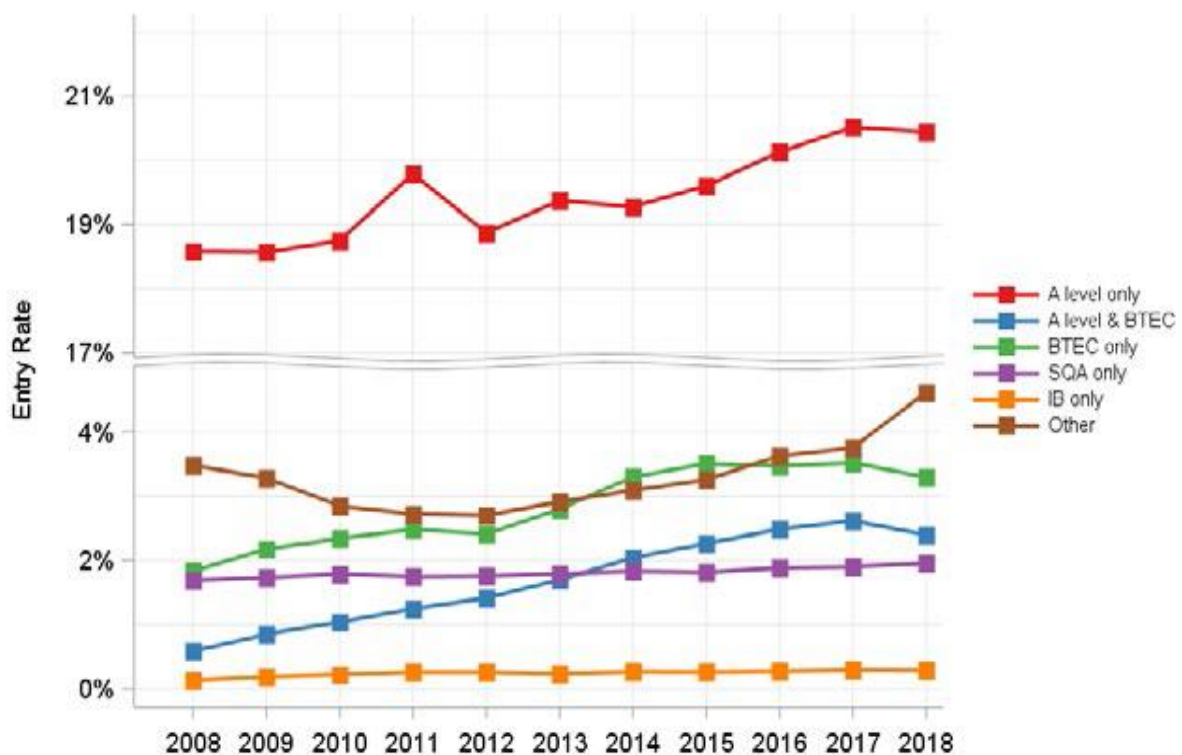
Findings include:

- Over 95% of the students who applied to study a course in higher education received at least one offer and over 86% were accepted. There was no significant difference between the percentage of applicants accepted with Cambridge Technicals and comparable applicants with other qualifications.
- The acceptance rate to Russell Group institutions was higher in 2019 than in 2018 (19% vs. 17%).

The Chief Executive of UVAC, Adrian Anderson has said: “Applied Generals allow an individual to explore a broad vocational area and can be combined with A Levels. They are different to both A Levels and T Levels and provide a distinct and valued learning option for 16 - 19 year-olds.”

Chris Hale, the Director of Policy at Universities UK (UUK) which speaks on behalf of 136 universities in England, Scotland, Northern Ireland and Wales said: “We support the development of the technical education route alongside core academic qualifications but we should not sacrifice qualifications that provide effective routes between higher and technical education, giving students greater choice and opportunities for a successful career, such as Applied General Qualifications.”

The growth in the use of Applied General qualifications as a route into higher education is demonstrated in the diagram below, demonstrating the growing importance of these qualifications:



Source: UCAS End of Cycle Report, 2018, Chapter 6

Here the growth of Cambridge Technicals is indicated within the data that forms the brown line which makes up for the slight decline in BTEC numbers – UCAS currently reports on BTECs as a separate category. Uptake in Cambridge Technicals grew by 36% last year.

15.5. The number of recent reforms to applied general qualifications, notably the introduction of external assessment means that the most recent (and most significant) changes have yet to work through the system and it is difficult to produce hard data on retention, performance and destinations of students that hold these revised qualifications – a period of evaluation is needed that will take up to five more years.

Applied General Qualifications do not only lead to 'traditional' undergraduate courses

In order to understand a bit more about the availability of routes into higher level skills and technical education, including degrees, OCR joined forces with UVAC to see what qualifications young people are using to access such programmes.

So far we have only dipped our toe in the water and there is more work to be done, but from a limited survey of UVAC member institutions, we learned the following:

- *77% of universities surveyed offer Level 4 or 5 qualifications*
- *85% offer Degree Apprenticeships at Level 6*
- *81% already have learners aged 18-19 starting on these programmes.*

This suggests that, whilst the numbers may be low, a wide range of universities are already offering alternatives to traditional undergraduate study programmes. OCR naturally takes an interest in how its qualifications are used to progress onto further study, whether those qualifications be our well-established stable of A Levels, our OCR Cambridge Technicals, or, increasingly, a blend of the two. Our survey revealed that entry requirements for Level 4 or 5 qualifications were stipulated in the following proportions:

- *65% A Levels (academic)*
- *76.5% Level 3 Technical and Vocational/Applied Qualifications*
- *71% GCSE maths and/or English.*

Although the sample survey was small, this shows clearly that Applied General Qualifications, such as Cambridge Technicals are already an established route into higher technical study. It would appear that such qualifications are widely recognised for these purposes. Also of great interest was the finding that, of 18-19 year olds accepted onto Level 4 and 5 programmes, the majority had a blend of A Levels and Applied General qualifications:

- *35% Academic qualifications (AS/A Levels and GCSEs)*
- *12% Level 3 Technical and/or Vocational Qualifications*
- *53% Mixture of Academic and Technical/Vocational Qualifications.*

Statistics show that the number of people who would qualify for access to a university place but have chosen other study programmes is massively in the minority. However, there are political and economic developments which might change this. Furthermore, there is evidence that options to take such qualifications are already available, albeit in small numbers, across a range of institutions. There is also some evidence to suggest that existing 16-19 technical and applied qualifications provide a good preparation for taking this step.

Progression from Applied Generals directly into employment or employment-based training (flexibility to move between routes)

The inclusion of vocational components in academic programmes allows greater flexibility where a student decides during their 16-19 study that university is not for them. The primary purpose of qualifications in the academic route must be to prepare students for higher education. But just as T Levels, where the primary purpose is to prepare a student for work/further training, can still lead to academic study and, indeed, attract UCAS points, so, too, academic qualifications (including A Levels) should provide the opportunity to progress to employment/further training. OCR has taken care to ensure that its Cambridge Technicals contains content which keeps open the option of moving directly into employment and employment-based training for those who decide not to progress to higher education. In developing the content we have worked with a wide range of employers including: **IBM; UK Athletics; Alton Towers; Mencap Sport; JLR; Kings College Hospital; Siemens; Fujitsu; and Cambridge TV.**

An employer view of Cambridge Technicals

“Qualifications such as Cambridge Technicals are important to fuel the expansion of, and investment into, the advanced engineering sector by furnishing an augmented pool of skilled, work-ready young people. In Siemens’ experience, and in conversations with our SME partners and supply chain, skills deficiency is a major obstacle to growth in the area that these qualifications will help counteract. Cambridge Technicals will help with the expansion of our Entry Level Talent specifically apprenticeships that require a broad and transferable skills base.” **Brenda Yearsley, School and Education Manager, Siemens plc**

16. What additional support might students need to achieve the new high quality offer at level 3?

Schools, colleges and training providers will be better placed to answer this question in detail. Whilst we recognise recent improvements in advice and guidance, exemplified by the Gatsby Benchmarks, great care will still need to be taken to ensure that young people have the full range of advice before selecting either of the pathways open to them. Also, more work is needed to look at how transition can be facilitated from one pathway to another, something that the Sainsbury Review highlighted as an important area to consider.

17. What additional support might SEND students need to achieve the new high quality offer at level 3?

Nil response

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?

No

19. Do you agree with our proposal to fund the same academic options for adults as 16 to nineteen year olds?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Yes, although it would be unusual for an adult to be able to access these.

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)?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

Yes

21. Do you agree that the principles described in paragraph 104 are the right ones to ensure qualifications meet the needs of adults?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

We welcome the recognition of different adult learners having different needs and of the very different life stages encompassed by the term 'adult'. With that in mind it is our view that in order to meet the demand for modular courses for adults there will be a need for a wide range of technical qualifications for adults which are distinct from T Levels.

We are not sure how workable the 2nd principle is in reality – exempting certain content is likely to be complicated and it may well be less of a burden for all to just show that they have the knowledge through the assessment as planned.

Do you agree with our proposed approach to making T Levels available to adults?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

We agree that adults should be able to access flexible qualifications that support them to reskill and upskill to keep pace with an increasingly changeable job market. Funding qualifications for adults should also mean providing funding models that support adults to take those qualifications, either in the form of a viable loan system or via direct funding where appropriate.

Additionally, adults looking to expand their interests should have a range of qualifications available for them to do so. We are not opposed to adults taking the same 'academic' qualifications as 16- to 19-year-olds. However, we question whether

such qualifications as currently proposed would be suited for older adults (above age of 23) and would therefore argue for the continued funding of Level 3 'academic' qualifications that are designed specifically for adults.

On the 'technical' route we believe that there have to be separate, non T-Level, modular qualifications and courses available to adults but based on common curriculum. Unfortunately, some qualifications may not be viable if only available to adults as they would no longer be subsidised by the 16 to 19-year-old qualifications so care should be taken when restricting access to the 16 to 19 offer. The majority of adults are not looking to make a wholesale career change by embarking on a two-year full-time course of study and lifelong learning will require a more atomised approach to learning and accreditation.

22. Do you agree with our proposal that T Level Occupational Specialisms should be offered as separate standalone qualifications for adults?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

T Levels are designed as coherent programmes and we think there are dangers in disaggregating them in this which could mean that the foundations may not have been taught.

23. Do you agree that the groups of qualifications for adults outlined in this chapter should continue to be funded?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

This is the minimum range of qualifications that should be funded for adults.

24. What occupations fall outside the scope of the occupational maps but are in demand by employers (as described in paragraph 116)?

We would like to make some general comments here about the occupational maps and standards. The occupational maps ignore the significance of the *transferable* skills required by many employers and in many occupations. These skills are highlighted in international reports (e.g. WEF's *The Future of Jobs*) as central to skills planning for 2030. On both the technical and academic pathways, the importance of broad non-

cognitive skills such as communication, collaboration and self-management could be better highlighted.

Moreover, there is the question of whether it is conceivable that all requirements of certain occupations can be defined within the maps. It is not necessarily that there are *occupations* outside the scope of the occupational maps, but that the definitions of work embodied within them are unlikely to ever be comprehensive with regard to required non-technical skills. The utility of skills such as communication, collaboration and self-management is to some degree indefinable. Dickerson and Morris (2019) highlight ways in which measuring and accounting for such skills is challenging, but indicate that using their measures, the returns to analytical and interpersonal skills are growing over time, while those to physical skills are declining.

This has been true over recent decades, but it is widely acknowledged that the workers of the future will be moving from job to job, and sector to sector, even more frequently during their working lives than those of the past. This change will be accelerated as a result of both automation and the coronavirus pandemic. WEF highlights that these factors are creating a “double-disruption” scenario for workers that is expected to “transform tasks, jobs and skills by 2025.” Many of these different jobs will require different specific technical skills, but that several transferable skills – especially those relating to self-management, communication and analysis – will be relevant broadly across sectors. WEF notes that:

“The top skills and skill groups which employers see as rising in prominence in the lead up to 2025 include groups such as critical thinking and analysis as well as problem-solving, and skills in self-management such as active learning, resilience, stress tolerance and flexibility.”

(WEF, *Future of Jobs Report 2020*, p5.)

While a large displacement of jobs by machines, algorithms and automated processes is likely, so is the creation of new roles and changes within roles “more adapted to the new division of labour between humans, machines and algorithms”. Even within jobs, 40% of the core skills required for a role will change in five years. It can be assumed this refers to specific skills or the understanding of particular procedures; transferable skills are applicable across circumstances. If a worker transitioned away from a role in which communication skills were essential (such as sales) to one working with data, say, communication would still be important in their later work as they would presumably be required to discuss findings.

The CBI’s report *Learning for life* (CBI, 2020) highlights that nine in ten workers will need some reskilling by 2030. Some new jobs will develop, particularly in areas that need “digital, STEM or interpersonal skills” but the occupations most likely to shrink have the lowest rates of training and lowest wages. While this issue is often framed around the idea of the “missing middle” (i.e. that high-skill/high-wage and low-skill/low-wage jobs will remain, but those in the middle are being hollowed out) there are particular dangers at the low-wage end.

All this highlights the importance of resisting an approach that focuses too heavily on the acquisition of specific technical skills at the expense of other, broader skills. Qualifications that provide learners with the opportunity to develop these transferable skills, and to have mixed learning pathways at level 3, are therefore crucial.

25. Do you agree with our proposed approach to reforming technical qualifications?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your response

We have set out above some of our concerns about a model which is predicated entirely on the use of occupational standards. The processes proposed may be slow and bureaucratic but are robust and logical for technical qualifications which are directly linked to occupational standards. We recommend that some consideration is given to alternative ways of creating new technical qualifications which may not fit with the T Level model or which need to be fast-tracked.

26. Is there anything else we should consider when implementing our proposed approach?

Any approval process must be transparent, involve independent review and an appeals process.

27. Do you agree with the proposed approach to qualifications in apprenticeship standards?

See our comments under question 25.

28. Do you agree with our proposed approach to reforming academic qualifications?

28.1. We are supportive of Ofqual having a role in strengthening applied general qualifications in the academic pathway. Elsewhere, we have indicated the need for greater uniformity between similar qualifications from different awarding bodies in this pathway and the need for a common language for describing them.

28.2. We would be anxious to avoid a situation where the processes for 'approval' and associated documentation/evidence absorbs huge amounts of time and resource to the detriment of developing the qualification itself, something that can be exacerbated by tight timescales and short notice. With clear requirements, good quality qualifications should be self-evident, with some supplementary evidence around, for example, stakeholder support.

29. Is there anything else we should consider when implementing our proposed approach?

Any approval process must be transparent, involve independent review and an appeals process. A process of early dialogue would also be useful to help gauge whether aspect of new proposals are likely to be accepted.

30. What support is needed to smooth the implementation of the proposed reforms?

We have commented elsewhere on the importance of gradual, incremental approaches to implementation with clear timescales and long notice periods.

About the impact assessment

The impact assessment that accompanies this consultation states:

If we were to assume that the achievement of at least five GCSEs at grade 4 or higher was a benchmark to access a level 3 programme, and applied this to students enrolled on qualifications no longer expected to remain, we estimate that the equivalent of around 4% of 16 to 19 year olds currently studying at level 3 may not be able to progress.

Whether or not the estimated 4% is accurate, we share concerns expressed in the report that there will be a group of young people who have not performed well at GCSE who will struggle to access Level 3 qualifications. We believe this will disproportionately impact people from disadvantaged backgrounds.

There is a correlation between students who take applied general qualifications and existing students facing one kind of disadvantage or another. We thought it would be helpful to share some data collected by Cambridge Assessment about the profiles of applied general students – see below – which also bears out Ofqual’s concerns in its response to this consultation (section 2) that “ It is important to consider how the qualifications funded in future can be designed to continue to allow a diverse range of learners to access level 3 qualifications effectively and successfully”.

Students with Applied Generals – socioeconomic characteristics

The points here are summarised from data in Vidal Rodeiro & Vitello (2020)¹⁶ which concerns 17year olds in 2016/17.

- Relative to academic qualifications, KS5 vocational qualifications were taken by a greater proportion of:
 - male students
 - students eligible for free school meals, and
 - low and middle attainers (in prior attainment terms).
- The more vocational the programme (in terms of learning hours), the greater the percentage of male students, FSM students and low/middle attainers.
- That said, VQs were most commonly taken by middle attainers, and a substantial proportion of high attainers, so they are certainly not only for “weaker” students.
- While vocational-only programmes are concentrated in FE colleges, comprehensive schools and sixth form colleges provide a significant percentage of mixed and “mostly” programmes – that is, they are providing at least some VQ qualifications.

¹⁶ Vidal Rodeiro, C.L. and Vitello, S. (2020). Vocational Qualifications at Key Stage 4 and Key Stage 5: who takes them and how they fit into students’ programmes of study. Cambridge Assessment Research Report. Cambridge, UK: Cambridge Assessment

The table below highlights some of these findings in more detail.

Educational characteristics		Academic only		Mostly Academic		Mixed		Mostly Vocational		Vocational only	
		N	%	N	%	N	%	N	%	N	%
KS5 School type	Comprehensive	108177	46.0	25931	35.9	14281	21.2	14475	22.3	8080	10.2
	Independent	33450	14.2	2467	3.4	488	0.7	365	0.6	230	0.3
	Selective	22157	9.4	1652	2.3	109	0.2	50	0.1	14	0.0
	Secondary Modern	2678	1.1	1167	1.6	889	1.3	1009	1.6	565	0.7
	Sixth form college	40732	17.3	11142	15.4	6129	9.1	7936	12.2	5061	6.4
	FE college	26685	11.3	29023	40.2	44459	65.9	40043	61.8	63590	80.0
	Other	1425	0.6	801	1.1	1091	1.6	922	1.4	1935	2.4
School Gender	Boys only	16554	7.0	1441	2.0	492	0.7	541	0.8	390	0.5
	Girls only	20522	8.7	2642	3.7	659	1.0	740	1.1	379	0.5
	Co-educational	198270	84.2	68101	94.3	66299	98.3	63523	98.0	78706	99.0
KS4 School type	Comprehensive	166579	74.1	58725	86.2	58419	88.7	58245	90.3	74073	90.2
	Independent	32550	14.5	3221	4.7	1167	1.8	1288	2.0	1373	1.7
	Selective	18700	8.3	1696	2.5	366	0.6	285	0.4	709	0.9
	Secondary Modern	5120	2.3	2459	3.6	2803	4.3	2832	4.4	3345	4.1
	Post-16 institution	186	0.1	204	0.3	248	0.4	198	0.3	147	0.2
	Other	1649	0.7	1796	2.6	2882	4.4	1681	2.6	2505	3.0
	KS4 attainment (within KS4 cohort)	Low	15423	6.9	25554	37.9	40728	62.8	34076	53.3	22973
Medium		56936	25.4	21120	31.3	19112	29.5	27346	42.8	49140	60.7
High		151974	67.7	20799	30.8	5021	7.7	2542	4.0	8908	11.0
KS4 attainment (within KS5 cohort)	Low	19909	8.9	28089	41.6	44852	69.2	42853	67.0	32625	40.3
	Medium	65697	29.3	21729	32.2	16365	25.2	19384	30.3	42208	52.1
	High	138727	61.8	17655	26.2	3644	5.6	1727	2.7	6188	7.6
English and Maths (A*-C)	No	176421	78.2	36061	52.4	17323	26.0	11907	18.4	65238	78.5
	Yes	49229	21.8	32755	47.6	49266	74.0	52853	81.6	17852	21.5
KS4 pathway	Academic only	136283	61.2	26061	38.6	18031	27.6	18689	29.2	27628	33.8
	Mostly Academic	75289	33.8	28193	41.8	27355	41.9	28596	44.7	36803	45.0
	Mixed	8978	4.0	9810	14.5	14684	22.5	13404	20.9	13698	16.8
	Mostly Vocational	1104	0.5	2004	3.0	3255	5.0	2334	3.6	2090	2.6
	Vocational only	979	0.4	1398	2.1	1984	3.0	972	1.5	1518	1.9

Candidate and centre characteristics by student pathway, from Vidal Rodeiro and Vitello, 2019

Implication A significant strength of Applied Generals is that they appear to appeal to more marginalised groups and individuals, and can aid their success and progression. A choice of A levels, T levels or nothing would risk these groups and individuals losing out. It is important to stress that the data does not indicate that Cambridge Technicals are for “weaker” candidates – we know that many high-attaining students take them.

There are also risks to some groups of students posed by the introduction of T Levels. These have been pointed out in the following taken from research produced by the Baker Dearing Trust

‘In this research, **80%** of students from disadvantaged backgrounds who progressed to university, and **100%** of those securing apprenticeships, mainly STEM-related, did so through technical programmes which are being phased out. As a consequence of the T Level being the sole replacement, about half of all students from disadvantaged backgrounds at UTCs will no longer have appropriate level 3 courses to study.’

Baker Dearing educational trust -impact analysis of impact of proposed reforms on UTCs, 2020

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