



Association of
Employment and Learning
Providers

AELP Submission: #105

The Association of Employment and Learning Providers (AELP) response to the Review of Post-16 Qualifications at Level 2 and below – April 2022

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6. Do you agree that we should fund qualifications that support progression to level 3 technical provision

Yes

Do you agree that qualifications in this group should be small to medium-sized, with a guideline size of 120-240 GLH?

No

Comments:

AELP believes that the government should continue to fund qualifications that support progression to level 3 technical qualifications. Progression to level 3 is important. However, many sectors- such as construction- have a high number of occupations that only need level 2 competency. Progression into sustainable employment should be valued as highly- and it should be up to the learner whether they wish to progress on to level 3 or not.

The key principle AELP believes needs to be struck is the flexibility of choice for learners – AELP is also particularly concerned that not enough flexibility is being considered to allow learners to progress across occupational areas – the focus is too much on linear progression within a sector. Fundable qualifications must support learners to develop good transferable knowledge, skills and behaviours (KSBs) which enable them to be more agile, especially in a dynamic economy where individuals are likely to have a growing number of employment roles across the duration of their working life.

On qualification size, AELP believes this proposal here is both too narrow and a far too binary approach to agreeing with a set of principles and greater flexibility is needed. Whilst certificate sized qualifications offer the majority of learners that springboard to progress, the government's planned reform proposals do not recognise the value of smaller or large-sized qualifications and their role in supporting progression to level 3 technical programmes. AELP has concerns this will not just cut back options and choices for learners but look to shoehorn all learners into a one-size-fits-all approach that would represent a backwards step from the current system.

7. Do you agree that we should fund occupational-entry qualifications leading to employment at level 2?

Yes

Do you agree that these qualifications should include broad route-specific content as well as the knowledge, skills and behaviours required to enter an occupation?

Yes

Do you agree that these qualifications should be large in size (minimum 540 GLH)?

No

Comments:

AELP believes that the government should absolutely continue to fund qualifications that support progression to employment at level 2. The key principle AELP believes needs to be struck is the flexibility of choice for learners - that there should be appropriate qualifications that provide skills for a specific occupational background but (particularly at the lower levels) these should sit alongside more generalist qualifications.

In some cases, a focus on specialism should not be seen as a negative proposition. For example, if a young person with a low educational starting wants to train as a plumber how will they now achieve this without a level 1 qualification in plumbing which is exacerbated further by the lack of approval of the plumbing apprenticeship at level 2 – meaning the entry point becomes level 3? Our ability to highlight this specific example is only possible as plumbing is only one of two qualifications specifically referenced in the consultation. Without greater clarity and transparency on the qualifications being removed due to low/no enrolments and then the analysis was undertaken by the Department for Education (DfE) on the “in-scope” qualifications AELP believes it largely renders this consultation process both an opaque and largely meaningless exercise as it makes understanding the impact of the programme of reform impossible.

On qualification size, again AELP would be concerned that this is a very narrow and a far too binary approach to agreeing a set of principles and flexibility is needed. Whilst large-sized qualifications would offer the majority that springboard to progress the proposals do not recognise the value of smaller or medium-sized qualifications and how these play a role in supporting progression to employment at level 2. On that basis, it would be wrong to discount them automatically from the scope of the future funded qualification landscape.

8. For 16 to 19-year-olds aiming to enter employment in an occupation at level 2, do you agree that the main qualification offer that should be available is



Option A: Group 2 qualifications only



Option B: Group 2 qualifications and the alternative of taking two smaller occupational-focus qualifications from group 3 (around 350 GLH) in two different occupational routes?

Comments:

AELP would support the principle of the more flexible approach being proposed here in allowing young people the opportunity to take smaller qualifications that can be aggregated – in essence, a similar concept used already with 'AS' and 'A' levels.

9. Do you agree that these qualifications should be delivered to 16 to 19-year-olds over two academic years as part of a wider study programme leading to employment?

No

Comment

AELP believes that a mandated two-year study programme would unnecessarily tie learners into a significant programme of learning and would be too long. One of the challenges identified in the qualification reforms is not enough positive progression and AELP believes the proposed direction of travel here for classroom-based is not the right approach to drive up improving positive outcomes and employment destinations.

Whilst the concept of a two-year programme may be applicable for *some* students, AELP believes there needs to be flexibility in the programme to ensure and encourage providers to support learners to be able to “step off”, achieve and progress - into programmes such as traineeships and apprenticeships that offer better long-term outcomes for the individual in terms of employment, earnings and progression. A two-year study programme should be the exception, not the rule, with more young people encouraged to be fast-tracked and progress into other programmes and/or employment to meet their aspirations.

AELP believes that lower-level qualifications (particularly below L2) are about engagement and celebration of the learner, possibly more than they are a signal to an employer of skills capability. The government's proposals fundamentally miss this point and will almost inevitably have unintended consequences of driving up a lack of engagement and increased drop-out.

Looking at 16-19 funded provision - in reality, traineeships the other strand of 16-19 provision last no more than 6 months (although 12 months are allowed this is rarely used as shorter interventions are more effective). Within 16-19 provision there would be a significant void between Traineeships and a new substantial two-year Study Programme. Again this seems more like creating another binary choice between a short course and a significant programme, with no middle group.

10. Do you agree that we should fund specialist qualifications at level 2?

Yes

11. Do you agree that we should fund qualifications at level 2 that develop cross-sectoral skills for young people?

Yes

12. Do you agree that we should fund qualifications to support progression to specialist level 3 academic qualifications?

Yes

Do you agree that qualifications in this group should be small-medium sized, with a guideline size of 120-240 GLH?

No

Comment

AELP believes that the government should continue to fund qualifications that support progression to specialist academic qualifications. However, on qualification size, AELP believes this proposal is again too narrow. Whilst this category of qualifications would make up the majority of provision offered the proposals are far too binary approach and greater acknowledgement is required to recognise the need for larger qualifications where necessary.

13. Do you agree that we should continue to fund level 2 performing arts graded exams in their current form?

Comment

AELP does not have a specific view on this.

14. Do you agree that we should fund level 1 pre-technical qualifications which focus on progression to level 2 and provide an introduction to the relevant occupational route?

Yes

Do you agree that qualifications in this group should be small to medium-sized, with a guideline size of 120-280 GLH?

No

Comment

AELP believes that the government should continue to fund level 1 pre-technical qualifications that support progression to level 2 – a blended and flexible approach is required with fundable qualifications that cover both generalist and specialist options. This does not mean the DfE shouldn't rationalise the overall numbers and types, just not reduce it to a binary choice.

AELP believes this proposal is both too narrow and a far too binary approach to agreeing with a set of principles and greater flexibility is needed. Whilst certificate sized qualifications would offer the majority that springboard to progress, the proposals do not recognise the value of smaller or large-sized qualifications. AELP has concerns this will not just cut back options for learners but look to shoehorn all learners into a one-size-fits-all approach.

15. Do you agree that we should fund level 1 qualifications which act as a prerequisite to employment

Yes

Comment

For unemployed individuals, the lack of a license to practice qualification would be a significant barrier to employment so AELP believes it should be funded alongside wider vocational training to enable progression into employment. Without doing this it would have a significant negative impact on the wider purpose and in the process would undermine the investment committed to the vocational training being delivered here which is aiming to support an employment outcome.

16. Do you agree that we should continue to fund level 1 graded qualifications in performing arts in their current form?

Comment

AELP does not have a specific view on this.

17. Do you agree that we should fund entry-level 3 pre-technical qualifications that support progression to level 1 study?

Yes

Do you agree that, for 16 to 19-year-olds, qualifications in this group should be small to medium-sized, with a guideline size of 120-280 GLH?

No

Comment

AELP believes that the government should continue to fund entry-level 3 pre-technical qualifications that support progression to level 1 study as many of these learners come from disadvantaged backgrounds and need support to develop the skills that over time will move them into the workplace and employment.

Failure to support this moving forward is highly likely to have the most negative impact on LLDD/SEND learners, which is highlighted in the supporting impact analysis. AELP believes this is clearly at odds with the government's stated ambitions for levelling up and improving the social mobility of the most disadvantaged learners in our society.

AELP believes that small to medium-sized qualifications should be the focus for 16-19 provision at entry-level, but believes that they should not be the only option.

18. Do you agree that we should continue to fund entry-level graded qualifications in performing arts in their current form?

Comment

AELP does not have a specific view on this subject area.

19. Do you agree that the design and delivery principles outlined in paragraphs 150 to 155 will ensure that level 2 technical qualifications are accessible to adults?

Yes

Comment

AELP broadly supports the DfE's design principles that include modular delivery of content – a principle that AELP supports at all levels not just at level 2 and for technical qualifications.

On the principle of the recognition of prior learning and experience – this is critical to avoid duplication and the unnecessary double funded cost, whilst ensuring the best value for money for the public purse.

The need for appropriate assessment of occupational-entry competence is essential - ensuring the right learners are on the right programme is a key principle in achieving a better level of outcomes and progressions. Linking to this point is the critical need for improving better careers, information, advice and guidance (CIAG) for all potential learners before they even get to the enrolment stage.

However, at this stage, the actual process for how qualifications like these will fit within the wider devolved adult funding landscape is still unclear – and this leaves a question mark that needs to be addressed. The DfE's proposal states that both mayoral combined authorities and the Greater London Authority (GLA) will have a role in choosing which qualifications they choose to fund in the new post-reformed landscape.

Greater clarity on the process for funded qualifications for adults in the devolved regions is also needed for both providers and awarding organisations. AELP has found confusion from several Combined Authorities to what actual extent they will be able to fully specify the qualifications they will be able to fund for adults, despite it being positioned in the proposals that Combined Authorities will have responsibility for this.

20. Do you agree that we should fund the following level 2 qualification groups for adult learners:

	Yes	No
Group 1: Qualifications supporting progression to level 3 technical study	<input checked="" type="radio"/>	<input type="radio"/>
Group 2: Occupational-entry qualifications	<input checked="" type="radio"/>	<input type="radio"/>
Group 4: Specialist qualifications	<input checked="" type="radio"/>	<input type="radio"/>
Group 5: Qualifications supporting cross-sectoral skills	<input checked="" type="radio"/>	<input type="radio"/>
Group 7: Qualifications supporting progression to level 3 academic study	<input checked="" type="radio"/>	<input type="radio"/>

21. Do you agree that we should fund occupational-focus qualifications at level 2 for adults?

Yes

Do you agree that these qualifications should be medium-sized, with a guideline size of 200-540 GLH?

No

Comment

Again – AELP would broadly agree this should be the general focus and principle but does not agree that this size of qualification should be the exclusive parameter in deciding on which qualification fit in the future landscape for adults or not.

22. Do you agree that we should consider requests to fund level 2 qualifications for occupations for which an employer-led occupational standard does not currently exist?

Yes

Comment

AELP agrees with this principle - this should not be a prohibitive factor where an occupational-led standard does not currently exist. AELP believes that lower-level qualifications (particularly below L2) are about engagement and celebration of the learner, possibly more than they are a signal to an employer of skills capability. As they stand, the government's proposals fundamentally miss this point and will almost inevitably have unintended consequences of driving up a lack of engagement and increased drop-out.

23. Do you agree that we fund the following qualification groups at level 1 for adult learners:

	Yes	No
Group 9: Level 1 pre-technical qualifications supporting progression to level 2 study	<input checked="" type="radio"/>	<input type="radio"/>
Group 10: Level 1 qualifications serving as a prerequisite to employment	<input checked="" type="radio"/>	<input type="radio"/>
Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications	<input checked="" type="radio"/>	<input type="radio"/>

24. Do you agree that we fund the following qualification groups at entry level for adult learners:

	Yes	No
Group 14: Entry level 3 pre-technical qualifications supporting progression to level 1	<input type="radio"/>	<input type="radio"/>

25. Do you agree we should remove funding at level 2 for non-GCSE/FSQ English qualifications?

Yes

Comment

At *level 2* AELP are very much of the view that FSQs and GCSE deserve parity and should be seen as the gold standard. However, in defunding wider *English* qualifications the ESFA need to carefully also fully consider its own rules and conditions moving forward to ensure LLDD/SEND learners are not disadvantaged.

Do you agree we should remove funding at level 2 for non-GCSE/FSQ maths qualifications?

Yes

Comment

At *level 2* AELP are very much of the view that FSQs and GCSE deserve parity and should be seen as the gold standard. However, in defunding wider *maths* qualifications the ESFA need to carefully also fully consider its own rules and conditions moving forward to ensure LLDD/SEND learners are not disadvantaged.

26. Do you agree we should continue to fund level 1 and entry-level English qualifications for learners who cannot access FSQs/ GCSEs

Yes

Comment

AELP believes there is a need to ensure that learners at lower levels may need stepping stone qualifications to help them progress to achieving a full recognised qualification in *English* and therefore support the DfE's proposals to continue to fund this provision.

Do you agree that we should continue to fund level 1 and entry-level maths qualifications for learners who cannot access FSQs/GCSEs?

Yes

Comment

As above, AELP believes there is a need to ensure that learners at lower levels may need stepping stone qualifications to help them progress to achieving a full recognised qualification in *maths* and therefore support the DfE’s proposals to continue to fund this provision.

27. Do you agree all non-GCSE/FSQ qualifications in English should be developed against the National Standards for Adult Literacy and Numeracy?

Yes

Do you agree all non-GCSE/FSQ qualifications in maths should be developed against the National Standards for Adult Literacy and Numeracy?

Yes

Comment

AELP believes developing non-GCSE/FSQ qualifications in both English and maths against the National Standards for Adult Literacy and Numeracy would help to ensure consistency and reinforce that all these qualifications have a degree of comparability and robustness that both learners and employers can be assured and have confidence with.

28. Do you agree that we should consider updating the National Standards for Adult Literacy and Numeracy before adding them to the regulation criteria?

Yes

Comment

AELP believes that the National Standards should at least be reviewed to ensure both currency and validity before adding them to the regulation criteria for developing non-GCSE/FSQ qualifications in both English and maths.

29. Do you agree that we should continue to fund ESOL qualification at each of the following levels:

	Yes	No
Level 2	<input checked="" type="radio"/>	<input type="radio"/>
Level 1	<input checked="" type="radio"/>	<input type="radio"/>
Entry-level (including sub levels 1, 2 and 3)	<input checked="" type="radio"/>	<input type="radio"/>

30. Do you agree that we develop national standards and set broad core content at level 1 for:

	Yes	No
Personal and social development	<input checked="" type="radio"/>	<input type="radio"/>
Employability skills	<input checked="" type="radio"/>	<input type="radio"/>
Independent living and life skills	<input checked="" type="radio"/>	<input type="radio"/>

31. Do you agree that we should develop national standards and set broad core content at entry-level (including entry-level 1, level 2 and entry-level 3) for:

	Yes	No
Personal and social development	<input checked="" type="radio"/>	<input type="radio"/>
Employability skills	<input checked="" type="radio"/>	<input type="radio"/>
Independent living and life skills	<input checked="" type="radio"/>	<input type="radio"/>

32. Do you agree the national standards set out on page 86 will cover the range of skills needed by students?

Yes

33. Thinking specifically about employability skills:

	Yes	No
As an employer, do you currently recognise or value any qualifications in employability skills?	<input checked="" type="radio"/>	<input type="radio"/>

34. Is it necessary to have standalone qualifications at entry level 1 and entry-level 2 that provide students with an opportunity to explore industries and occupations?

Yes

Comment

Although through the call for evidence there was limited support from employers and only 32% of respondents said these qualifications were “essential” they still play a key role for learners, with particular characteristics such as having SEND or from disadvantaged backgrounds and are therefore an integral part of their study programme which AELP believes should be retained.

For those with no prior attainment, including adult learners furthest from the labour market, these qualifications can also represent their first step towards re-engaging with education and training and again reinforces the need to be retained in the future reformed landscape.

35. What support is needed to smooth the implementation of the proposed reforms to level 2 and below qualifications?

Comment

Without greater transparency, it is impossible for AELP and other stakeholders to properly understand the impact behind the intent laid out in the level 2 and below proposals laid out by the DfE.

AELP requested a list of the in-scope qualifications and the analysis of which of those 'in-scope' were likely to "not fit in the future landscape" for 16-19 and adult provision as articulated by the DfE in the consultation papers.

Our request (and others') attempts to obtain this list and analysis were unfairly rejected. On this basis, AELP believes this consultation to be materially flawed in both its approach and its design.

Currently, stakeholders are only being given a top-down holistic view of the proposed changes supported by a set of closed questions that point towards a future landscape where 90% of qualifications for young people and 85% of qualifications for adults are likely to be defunded. The proposed level of change is undoubtedly seismic and adds weight to the argument for needing greater transparency.

To ensure a smooth implementation and transition to the future reformed landscape AELP urges the DfE to remove its opaque approach and publish its analysis of "in scope" qualifications so that the sector can fully understand the impact of this programme of reforms and identify cold spots in provision that are likely to appear that will hamper the options for both young people and adults.

Greater clarity on the process for funded qualifications for adults in the devolved regions is also needed for both providers and awarding organisations. AELP has found confusion from several Combined Authorities to what actual extent they will be able to fully specify the qualifications they will be able to fund for adults, despite it being positioned in the proposals that Combined Authorities will have responsibility for this.

In the impact analysis, the DfE has already acknowledged disruption in the awarding organisation space from its own planned approach. Further consideration and analyse are required when overlaying the future decisions taken at a regional level to the ongoing sustainability and viability of a wider number of awarding organisations and what impact this could have on the availability of qualifications valued by employers and learners too.

36. Do you have any concerns regarding the potential impact that the principles and proposals outlined in this consultation may have on students with SEND or those with protected characteristics under the Equality Act 2010?

Comment

It is important to recognise that learners with SEND tend to be registered with more niche and lower-level qualifications appropriate to their sometimes complex needs. In the government's proposals to defund qualifications with low or no enrolments, due care and attention are required to ensure provision isn't removed that would have a direct impact on the life chances of learners with SEND.

37. Are there any additional impacts that you think should be included in the general impact assessment which will accompany our response to this consultation?

Comment

When defunding qualifications, the government need to also properly account for periods of low enrolment that are directly due to the impact of the Covid-19 pandemic which meant qualifications drop into scope due to low enrolments in a particular year or years. This is specifically important for qualifications that cannot be effectively delivered online or remotely and therefore there were periods when enrolments were artificially reduced.