



Association of
Employment and Learning
Providers

AELP Submission: #103

AELP submission to Education
Select Committee Inquiry
Review of Post-16 Education

Review of Post-16 Education

Introduction

The Association of Employment and Learning Providers (AELP) warmly welcomes the Education Select Committee's timely inquiry, which centres on reviewing the effectiveness of post-16 education. In summary, our key recommendations are:

- T-Levels have been unhelpfully positioned against applied general qualifications. Whilst there is a need for curation of fundable qualifications available at level 3 there should be a range of programmes available to meet the needs of a wide range of learners and employers.
- The government's decision on T Levels to bring maths and English policy in line with A-Levels leaves apprenticeships as an outlier. There must be parity in approach between all three of these flagship programmes on core skills.
- Apprenticeships offer a unique proposition in the post-16 education system, but smaller employers who traditionally employ young people and career starters on lower level programmes need more government support in a currently unbalanced landscape.
- More effective and inclusive careers information, advice and guidance is needed to ensure that young people are aware of the breadth of academic and vocational progression opportunities available in post-16 education.
- A post-qualification admission system would add value, as would ensuring apprenticeships join T-Levels in being awarded UCAS points along with being included in performance league tables to properly incentivise schools to have a more holistic approach to progression opportunities for young people.

T-Levels should complement not complete with applied general qualifications

As part of this inquiry, we felt it would be useful to summarise AELP's previous response to the Department for Education (DfE) consultation on the review of level 3 qualifications in late 2020, which link to many key areas of this inquiry. AELP like a significant number of respondents raised concerns about the proposal to arbitrarily defund significant numbers of level 3 applied general qualifications. This move results in a binary choice for learners between A-Levels and untried and untested T Levels. AELP supported part of the DfE's rationale that around 12,000 approved qualifications on offer for funding were far too broad. However, we believe that this could have been resolved with rationalisation and streamlining, rather than a wide-scale cull of other level 3 qualifications.

The initial proposed transition period lacked the appropriate time to allow T Levels to be tested and bed in, with just 1,300 learners enrolled in wave one, on a brand new programme being delivered in the middle of an unprecedented pandemic. This is not an ideal time to properly monitor effectiveness. AELP also raised concerns about the inference that existing applied general qualifications lacked quality and robustness. These claims were damaging to past and current learners enrolled on these courses, and they have reduced employer confidence. Lessons must be learned from this debacle.

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Apprenticeships offer a unique proposition, but smaller employers need more support

Apprenticeships offer a fantastic and unique opportunity for participants to “earn and learn”, and support a pipeline of young talent entering the labour market. However, the current apprenticeship system lacks balance. Further government intervention is required, to better support smaller employers to engage with apprenticeships more effectively. By the government's estimations, SMEs (small and medium-sized enterprises) account for 98%% of the business population. These employers typically take a higher proportion of young people on level 2 programmes, as opposed to retraining or upskilling existing employees. While retraining and upskilling has an important role, driving new talent into the job market is pivotal to addressing the nation’s skills gaps, which have been exacerbated by the Covid-19 pandemic and the UK exiting the European Union.

More effective and inclusive careers information, advice and guidance needed

AELP has always championed the need for more inclusive careers, information, advice and guidance for young people. We worked closely with Lord Baker in the development and introduction of the "Baker Clause" for schools. The introduction of the Baker Clause represented a big positive step forward. Despite this, too many schools still do not either comply with the requirements in the Baker Clause or simply pay lip service to it. AELP believes that the only way to drive effective change is for lack of compliance with the Baker Clause to become a limiting grade in an inspection by Ofsted. We urge the Committee to ensure inclusive and effective careers, information, advice and guidance is a key focus in the inquiry’s final recommendations.

About AELP and Our Members

The Association of Employment and Learning Providers (AELP) is a national membership body, proudly representing around 800 organisations. AELP members support thousands of businesses and millions of learners in England by delivering a wide range of training, vocational learning, and employability programmes. We support learners of all ages, in every community, and at every level of post-16 study. Formed in 1988, AELP's priority has always been advocating for the training providers that we represent and offering a wide range of competitive member benefits.

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The experience of T

Levels so far, and changes that should be made to ensure they are accessible to all students.

So far, Independent Training Provider (ITP) involvement in the delivery of T Levels remains limited. This is driven by several issues, including the limitations of government-set market entry requirements. Furthermore, there have been issues in T Level routeways in the early waves of rollout, and ITPs have been unable to access key capital and/or capacity building funds. These funds were only made available to grant-funded providers to support the readiness for T Levels.

As context, ITPs currently deliver around 35,000 Study Programme places annually through direct funding from the ESFA, alongside subcontracted arrangements through main contractors, including granted-funded providers such as General FE Colleges. Too often, policymakers only associate ITPs with apprenticeship delivery. This is absolutely not the case, with ITPs having market share on programmes such as skills bootcamps and traineeships. ITPs also deliver significant volumes in adult education and 16-19 provision.¹ Around 80% of ITPs are currently judged by Ofsted as good or outstanding. These providers have told AELP that they would like to be involved in delivery in T Levels in a range of sectors, including hair, beauty and aesthetics, accountancy, finance, digital, and health. However, as they do not have a direct contract with the ESFA for 16-19 Study Programmes, they are effectively “locked out” of a system where they could offer substantial occupational expertise, excellent links with employers and also experience in recruiting and training young people through routes such as apprenticeships. ITPs have links to over 300,000 employers across England and this is a huge missed opportunity.

Unfortunately, this institutional bias against ITPs is an all-too-common feature within the wider FE system. This ultimately limits learner and employer choice. It also impacts potential market capacity. The government should focus on solutions that can offer maximum value for money and deliver according to learner and business needs, rather than pigeonholing provision by provider type.

AELP believes that there should be a high-quality ecosystem, with a range of providers who can deliver high-quality provision across all FE programmes, including T Levels. If the government is to achieve its ambitious goal of 100,000 high-quality T Levels, AELP believes that it needs to reconsider its market entry criteria and properly recognise the expertise and capacity of the track record of other providers in the FE system.

The strengths and weaknesses of the current system of post-16 qualifications, including A-Levels, T Levels, BTECs and apprenticeships, in preparing young people for work or further and higher education.

Fundamentally, all young people deserve access to high quality, informative and impartial careers, information, advice and guidance (CIAG), that gives parity of esteem to academic

¹ <http://www.aelp.org.uk/media/4376/keyfacts-itps-v12.pdf>

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and vocational

routes. Unfortunately, this is not always the case. The onus on policymakers to tackle this as a priority.

AELP has long championed this and worked closely with supporting Lord Baker with the development and introduction of the "Baker Clause" to schools. The introduction of the Baker Clause represented a big positive step forward and many schools and MATs have embraced the need to give their young people access to impartial information on the breadth of vocational and academic progression opportunities. However, despite this too many schools do not either comply with the requirements in the Baker Clause or simply play lip service to it, examples include selectively choosing students they think are "best suited" as opposed to allowing young people to make their own informed choice. The debate on strengthening the Baker Clause featured in the recent Skills and Post-16 Further Education Bill, but AELP believes that the only way to drive effective change is for lack of compliance with the Baker Clause to become a limiting grade in an inspection by Ofsted. Such an approach was previously used in ensuring the "Every Child Matters" approach was given due care and appropriate attention by providers to drive up safeguarding standards.

AELP supports the retention of some applied general qualifications, including BTECs, though recognising that some streamlining and rationalisation would be sensible. One of the DfE's drivers for reforming level 3 qualifications was that too many classroom-based courses did not lead to high enough rates of learner progression. This point indicates the need to look more widely at how funding is allocated, to avoid incentivising filling classrooms to hit recruitment targets, when the programme may not necessarily be the best programme for every student. From a provider perspective, this in itself highlights the fragmented nature of funded programmes. Many providers have limited access to different funding streams. As a result, they have to direct learners onto the programmes that they can offer, rather than the programme they would like to be able to offer, as they do not meet the entry requirements to access specific funding streams.

On T Levels, there remain many unanswered challenges that still need to be addressed, particularly progression from a level 3 T Level to a level 4 apprenticeship. AELP believes this is likely to hamper progression opportunities for T Level students on some routes, relating to the recognition of prior learning (RPL) and employer expectations on occupational competency. T Levels also only offer the skills levels required to start work, not those required to be occupationally competent in the role the learner has, which is what an apprenticeship requires. In other words, the learning gained from completing a T Level falls short of the starting point for a level 4 apprenticeship.

Where a T Level student undertakes a level 3 programme with, in essence, 20% on-the-job training and 80% off-the-job training, there is a concern that in some sectors such as engineering that students will not be able to progress onto a level 4 apprenticeship due to the amount of previous on-the-job training undertaken. This means that students may have to consider a level 3 apprenticeship. On some routes, the quantity of off-the-job training may mean they will not be eligible to meet the 12 months and 20% requirement of new skills required to undertake the level 3 apprenticeship either. For some students, this may mean

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the only progression is not to transition into work and a job, but having to instead progress onto a higher technical qualification (HTQ).

As a result, T Levels may offer limited progression opportunities onto apprenticeships, and not drive the change that the government wish to reach, in addressing issues with some of the current classroom-based programmes, that T Levels are replacing.

Unlike with T Levels, the current apprenticeship system lacks UCAS points. This is a missed opportunity that could be used as a way to incentivise positive behaviours in schools through performance points. It would also enable better parity between academic and vocational routes, to ensure the best destination for the young person- not the intuition-through unbalanced performance outcome measures.

Apprenticeships also remain the only part of the 16-19 funding landscape where the state does not fully fund the training and assessment needs of the learner. AELP believes that all 16-19 apprentices should be fully-funded from the DfE's 16-19 Budget, rather than through levy funding or co-investment from non-levy-paying employers.

16-19 apprenticeships offer fantastic opportunities for young people, but participation has declined significantly following the apprenticeship reforms. In FY20-21 only 20% of all apprenticeship starts were under 19. This represents an all-time low, with just 65,100 starts compared to 76,300 in FY19/20 and 97,700 in FY18/19.² AELP believes that the government needs to better incentivise smaller employers to utilise apprenticeships, which would, in turn, drive participation from young people on key entry-level programmes. These are also at a worryingly low. Level 2 apprenticeships now only account for 1 in every 5 starts, impacting social mobility and youth participation.

The recent announcement on changing the maths and English exit requirements for T Levels (to bring them into line with A-Levels) has created another issue which then leaves the apprenticeship programme as an outlier. This creates yet another divide when the government says that it wants to close the gap of perceptions between academic and vocational programmes. While the achievement of maths and English qualifications is not a requirement for successful completion of either an A-Level or a T Level, it remains a requirement on apprenticeships, which in some cases are significantly shorter in duration. An apprenticeship is also a full-time job and contains a minimum of 20% off-the-job training, which must take place in working time with no home study. Furthermore, the funding rates for maths and English with an apprenticeship remain pitifully low at just £471 per qualification, which is around just half of the funding available for delivery in a classroom-based setting, at £724 each. With poor funding rates for maths and English that does not cover the average cost of delivery, this acts as a disincentive for some providers to recruit disadvantaged learners onto apprenticeships.

² [Apprenticeships and traineeships, Academic Year 2020/21 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.gov.uk/explore-education-statistics)

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AELP strongly believes that parity of maths and English policy is required between A-Levels, T Levels and apprenticeships.

The benefits and challenges the Government's proposed changes to Level 3 qualifications would bring, regarding any implications for BTECs and routes into apprenticeships.

AELP is supportive of T Levels, but with low scale enrolments, we are concerned that these programmes remain inadequately tested at scale and length. Therefore, a degree of caution is required. The Government does not need to look far back to learn painful lessons from the disaster of 14-19 diplomas, and more recently, the challenging process of transitioning from apprenticeship frameworks to apprenticeship standards. Time is required to properly make that transitional shift. The original timeline to shift from applied generals to T Levels was far too short, although recent government announcements indicate a shift in thinking on the transitional period. Peers in the House of Lords secured an amendment to the Skills and Post-16 Further Education Bill for a four-year transition, although the government subsequently reduced this to a year through further amendments in the House of Commons. This remains a live topic, as there is still so much uncertainty. This does not offer much confidence for providers, employers, young people and their parents.

Even before the Covid-19 pandemic, there were concerns about the ability of FE Colleges to generate enough industry placements. The DfE funded several initiatives such as the capacity delivery fund (CDF) and an employer incentive to support industry placements, which runs until July 2022. More recently, the DfE introduced "temporary" flexibilities to allow a proportion of industry placements in some routeways to be delivered remotely, such as in digital and construction, but not in education or childcare. Ensuring that industry placements are high quality and robust remains a key feature, but also a key risk – specifically the on-the-job aspect of the programme. This will be important for future progression opportunities for learners following completion of their T Level programme. We must not forget that the industry placement was supposed to be the unique selling point of T Levels. If the industrial placement cannot be done to a high level - or at all - there is a significant risk to the whole integrity of the programme. This is where ITPs- particularly apprenticeship providers, with strong links to employers could have been useful.

It is vital that in promoting new opportunities such as T Levels the government does not discredit the credibility of longstanding current or legacy programmes. Concerns have been raised about the language being used that implied the quality and robustness of existing applied general qualification (including BTECs) was insufficient and low, which was particularly damaging to both past and current learners enrolled on these courses as well impacting employer confidence.

Unanswered challenges remain that are likely to hamper progression opportunities for T Level students on some routes and these relate to recognition of prior learning (RPL) and employer expectations on occupational competency. There are likely to be scenarios that will mean students may have to consider a level 3 apprenticeship and on some routes, the

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quantity of off-the-job training may mean they will not be eligible to meet the 12 months and 20% requirement of new skills required to undertake the level 3 apprenticeship either. Some form of bridging provision could well be required to fill the gap created in such examples. This was something originally muted when T Levels were being first developed. Elsewhere the ESFA has worked to create "occupational traineeships" to create a stronger potential progression pathway into a specific apprenticeship sector – AELP believes that an initiative similar to this could help bridge the transition from T Levels to apprenticeship in certain routes or occupations.

The extent to which the Government's review of level 3 qualifications will impact disadvantaged groups, students from minority ethnic backgrounds, students known to the care system, and students with special educational needs or disabilities, and what measures might be put in place to mitigate any negative impacts

The Education Select Committee should note that the DfE's impact analysis, which was published alongside the proposed level 3 reforms consultation, highlights that learners from disadvantaged backgrounds are at the greatest risk of being disproportionately impacted.

For many of these learners, a T Level or A-Level programme will not be right for them. This is why it is vital to consider a more measured approach to defunding wider applied general qualifications, as the programme plays a key role in supporting the needs of many disadvantaged learners.

AELP feels there are still some question marks over the role of the T Level transition programme and the robustness of the current arrangements. To some extent, the current transition programme feels tokenistic and a missed opportunity, especially for disadvantaged learners. While some form of transition programme has a role to play, the DfE, in our view, would have been better off reinforcing the existing study programmes rather than creating a whole new strand of provision, with limited participants and benefits.

The benefits and disadvantages of introducing a baccalaureate system in post-16 education allow students to take a variety of subjects, including both academic and vocational options.

AELP believes that a baccalaureate system would be an ambitious aspiration for post-16 education. On the one hand, it has the opportunity to help create better parity and prestige between academic and vocational routes. However, it could be complex to administer and exacerbate an already confusing and crowded landscape for young people, with big gaps remaining in ensuring effective CIAG.

Many providers have limited access to different funding streams. As a result, there is a temptation to shoehorn learners onto the programmes they can offer rather than the programme they would like to be able to offer, as they do not meet the entry requirements to access it. In developing a baccalaureate system, it would be important to ensure access to provision for the providers involved in such a programme.

The benefits and disadvantages of a post-qualification admission system.

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AELP supports the concept of a post-qualification admissions system. However, there needs to be a balance of incentivisation and penalisation. As highlighted earlier in this submission, the lack of UCAS points for apprenticeships is a missed opportunity. This could be a way to incentive positive behaviours in schools through performance points, to ensure parity between academic and vocational routes. We feel this is a key area to address and for this inquiry to consider.



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