



AELP Submission: #128

**Post-16 Level 3 and Below Pathways
Consultation response**

Post-16 Level 3 and Below Pathways Consultation response

AELP has reviewed the Department for Education's consultation on post-16 qualification reforms. Our position emphasises learner progression, transferability, sequential/stackable achievement and employer recognition. Here are our headline asks:

- Offer coherent programmes for vocational learners, introduce a medium sized V level option in depth critical sectors to support transition to employment or further study
- Protect transferability across level 2 pathways, progression routes to further study, HE and apprenticeships.
- Ensure national prior learning guidance is in place for level 2 and learners can leave programmes with 'accumulated credits' to support a study transfer or future study or employment
- Provide sufficient lead-in time and clarity for providers and learners.
- Ensure parity and recognition, gaining UCAS and HE recognition early whilst ensuring alignment with employers.

Please also see our full consultation response

V Levels

We are proposing V Levels will be 360 guided learning hours (GLH) to enable students to combine them with other V Levels and A levels. Where larger subjects are needed, we propose that these are offered through T Levels. In taking this approach, are there any risks or issues we need to be aware of?:

- Setting all V Levels at A-level size (circa 360 GLH) risks narrowing technical breadth and undermining progression for vocationally oriented learners in Sport, Creative subjects, and Performing Arts for example.

Rationale:

- Creates a gap between highly specialised T Levels and small V Levels, increasing the chance of disengagement for learners who need coherent, sector-based programmes.
- Providers have built strong provision around large qualifications; shrinking the size will introduce timetabling/staffing inefficiencies and has the potential to dilute sector identity.

- Based on published data for level 3 qualifications, small qualifications attract only ~25,000 enrolments (across 4–5 subjects) versus over 100,000 on large qualifications in the post-16 sector, highlighting the cultural shift if V Levels are restricted to 360 GLH.

Suggestions AELP can support:

- Design a medium-size V Level option (e.g., 540–600 GLH) in sectors where depth is essential for progression (e.g., Sport, Performing Arts and Creative subjects).
- Publish clear guidance which allows providers to deliver flexible pathways to support local labour market needs coupled with a review of funding bands.

Are there any particular issues for subjects or students that we need to be aware of as a result of not having medium sized V Levels?

- Absence of a medium-size option forces learners to choose multiple small qualifications, reducing coherence and the potential to reduce UCAS tariff competitiveness for HE entry in applied subjects.
- Whilst we understand that there is the ability to combine qualifications e.g., V levels and A levels, there remains a concern that learners won't be able to build coherent V level programmes if they are unable to combine V levels from similar subject areas.

Rationale:

- Depth is necessary for HE routes such as sports therapy, production arts, and creative media; supporting learners to build both depth and breadth of knowledge and behaviours and maybe more importantly develop, practice and hone the skills required to be successful.
- Having no option for large programmes has the potential to limit the time learners get to successfully consolidate their knowledge into successful skills practice.
- AELP members report that mixed A level and V level models might require multiple fractional specialists per cohort which has the potential to become unaffordable and hard to timetable at scale.
- In addition, with skills shortages and recruitment issues continuing to impact the sector the this could add more complexity to recruitment processes.
- ITPs get very limited support to recruitment initiatives and given that they also deliver nearly two thirds of apprenticeships (the most likely destination)
- alongside paid work of V level graduates) in sectors that will align to V levels it is imperative that all provider types have equity of access to government initiatives.

Suggestions AELP can support:

- Introduce a nationally recognised “medium V Level” size with defined sector criteria and parity in UCAS tariff mapping.
- Allow combined programmes (e.g., medium V Level + A Level/V Level) to count as a single study programme for funding and accountability.

Which subjects do you think are most appropriate for delivery through V Levels?

Please provide evidence of relevance to employment sectors or further study.:

- V Levels should target broad vocational subjects where T Levels are a poor fit and A Levels lack applied assessment e.g., Sport, Performing Arts, Creative Media, Business/Enterprise, Hair & beauty, Engineering, Public Services and IT.

Rationale:

These areas benefit from project and performance based assessment and varied employer input without the placement volume of T Levels.

The latest Ofqual and DfE enrolment data indicate strong demand for large qualifications in the subject areas above, suggesting that learner preference is

for coherent programmes rather than smaller qualifications

Practical suggestions AELP can support:

Support DfE to define subject/qualification lists via independent panels with providers, AOs, employers, and HE; we suggest that this is refreshed every

two years to keep currency and to ensure any new V level qualifications remain fit for purpose

Signal progression routes (HE, apprenticeships, employment) in official V Level specifications with sample pathways. We appreciate that a significant

amount of thought has already gone into what different 'pathways' will look like and are ready to support further development.

4 How could current information, advice and guidance be improved or what new guidelines or measures should be developed to ensure that

students are informed about V Level subject selection and combinations?

Please give us your views:

Careers guidance should position V Levels explicitly as high-quality, applied alternatives with clear progression routes and parity with A Levels. There is a

concern that the key stage 3 and 4 choices offered by schools has continued to be reduced to focus on progress 8 measures. Therefore, we also propose

that as part of the schools' white paper thought is given to how young people can experience a broader range of experiences during key stage 3 and 4

and potentially even earlier in their academic journey. Significant investment in upskilling of careers advisors will also be required to support young

people to make truly informed decisions about their future. V levels cannot be seen as an option for only those who don't achieve the required grades to enrol on an A level or T level. This should also be aligned with the pathways work already underway and clearly demonstrate that apprenticeships have an equitable standing alongside A levels, V levels and T levels.

Rationale:

Young people's choices are shaped by what their local provider offers and by CEIAG quality; mixed messages risk reinforcing a two-tier (possibly three-tier) perception.

HE entry requirements must be clarified early to avoid uncertainty and last-minute changes for applicants.

Suggestions AELP can support:

Launch a national IAG toolkit for schools/colleges with provider-ready slide decks, video explainers, and progression maps.

Invest in a 'find a post-16 provider' toolkit (similar to apprenticeship service' which supports careers advisors, young people and parents/guardians to

identify all providers offering post-16 education in their local area and the types of qualifications and courses on offer. We have to understand that not all

young people are ready nor want to progress to large A level of General Further Education Colleges.

Secure UCAS and University agreement to publish exemplar offers for V Levels ahead of first teaching.

New T Levels

What factors should we consider when creating T Levels where there are currently no level 3 occupational standards?

Please explain your answer.:

- Do not force T Level models into creative/performance sectors lacking suitable occupational standards; consider alternative applied programmes where placements are impractical.

Rationale:

- Securing lengthy industry placements and specialist facilities is a major barrier in these sectors, especially for SMEs and some rural providers
- Over-reliance on rigid occupational alignment risks narrowing opportunity and disadvantaging talented learners in performance-based disciplines.

Suggestions AELP can support:

- Provide a “creative/performance applied route” with realistic employer engagement (live briefs, productions, showcases) instead of mandatory long placements.

Level 2 pathways

We recognise that students do change their minds, and some students may wish to transfer between the Further Study pathway and the Occupational pathway. Others may have the opportunity to progress to level 3 or take up an apprenticeship opportunity mid-way through their Occupational Certificate.

How can the two pathways, and the two qualifications, be designed to make these transitions as easy as possible?:

- Transitions should be intentionally designed via a shared core and credit recognition so learners can switch without penalty as interests or circumstances change. Learners should also be able transfer credits/prior achievement across pathways so they are not penalised for changing their pathway. This credit transfer/prior achievement information will also support learners in their transition to higher study, therefore ensuring that no learner is disadvantaged later in their academic journey should they decide to switch pathways.

Rationale:

- A shared core underpins foundational knowledge and essential skills; modular credit helps recognise progress and reduces drop-out risk.
- Clear signposting into apprenticeships (with RPL) prevents learners from being trapped on unsuitable routes.

Suggestions AELP can support:

- Mandate a common core (e.g., 30–40% GLH) across the Foundation and Occupational pathways with standardised assessment.
- Publish national RPL guidance so providers and employers can map Level 2 achievement into apprenticeship standards and/or alternative level 2 pathways

Foundation Certificates

We’re proposing that all Foundation Certificates are the same size – 240 guided learning hours (GLH) – to ensure they are a consistent size and can fit within a one-year study programme allowing for English, maths and non-qualification activity such as employability, enrichment and pastoral support, and exposure to level 3 study. In taking this approach, are there any risks or issues we need to be aware of?

Please give us your views:

- A fixed size may reduce the ability for providers and awarding organisations to build meaningful programmes. For example, the scope of the foundation programme may not allow or a meaningful amount of GLH to explore the vocational or technical subject that the learner may want to transition to in the future.

Rationale:

- Foundation learners often require additional contact time for confidence-building and employability skills.
- Insufficient flex could reduce capacity for local projects and employer encounters that build motivation.

Suggestions AELP can support:

- Protect and allow more flexibility for timetabled hours for work-related learning (employer talks, site visits, micro-placements). Given the main driver is that the learner progresses to a quality level 3 destination the ability to provide more meaningful interactions will only serve to support this transition.

Should any additional criteria be considered when selecting the subjects suitable to become a Foundation Certificate?

- Subjects should be chosen for progression potential, local labour market relevance, and accessibility for disadvantaged learners.

Rationale:

- Clarity needed on progression to Level 3 (including V Levels, T Levels where appropriate) to avoid dead ends. Learners who take a break from study and return to post-16 study should not be disadvantaged.
- A mix of national and locally relevant options sustain engagement and employer support, including sectors outside national priority lists.

Suggestions AELP can support:

- Require each subject area to publish mapped progression routes and example learner journeys.
- Allow LSIPs the potential to identify up to three local priority areas and work closely with providers to ensure that a full breadth of options are available to all

Are there any other potential subjects you think should be considered for Foundation Certificates?

- Add Construction, Sport, and Creative subjects where strong demand and facilities exist, alongside Business/Enterprise and Health & Social Care.

Rationale:

- These areas attract high enrolments and offer transferable skills that support multiple Level 3 destinations.
- Early exposure enables informed choice into occupational or further study routes at Level 3.

Suggestions AELP can support:

- Pilot extended tasters across these subjects with rotating projects in term 1 to aid informed pathway choice.
- Include micro-credentials (e.g., health & safety, first aid) recognised by local employers.

Occupational Certificates

We expect the occupational pathway to last two years, in line with current legislation. However, we recognise that some learners may have legitimate reasons for leaving the pathway early, such as progressing to a work-based training programme or moving on to a level 3 qualification. Are there any other circumstances you believe would justify a learner stepping off the pathway before completing the full two years?

Please provide examples and explain why these should be considered.:

- Learners stepping into apprenticeships or employment, or paused by health/caring responsibilities, should receive formal recognition of partial achievement. Learners and providers should not be disadvantaged if they step off an occupational pathway early.

Rationale (evidence):

- Non-completion currently harms provider accountability while representing a positive outcome for some learners (apprenticeship). Formalising partial credit maintains momentum and fairness.

Suggestions AELP can support:

- Issue a Level 2 Occupational Credit Statement (or similar) documenting assessed units and skills, portable into apprenticeships via RPL.
- Adjust QAR/achievement measures so apprenticeship progression is a recognised success outcome rather than a penalty.

We are proposing that DfE sets the introductory core content for Occupational Certificates and that this core content is shared across

Please give reasons for your answer.:

- Where it reflects occupational standards and allows sector organisations to keep content current without frequent revalidation cycles. However, caution should be taken to ensure that occupational standards have also been considered to allow any potential smooth transition between Foundation and Occupational pathways.

Rationale:

- Shared expectations increase employer confidence and portability of outcomes.
- Sector-led updates maintain relevance while reducing provider churn.

Suggestions AELP can support:

- Align review cycles with occupational standards updates; include employer SMEs and providers on panels.
- Permit optional specialisms to reflect local demand without re-writing the whole qualification.

We believe the sizes of each Occupational Certificate should be variable and driven by the Skills England national occupational standard(s) it is linked to, as opposed to having a fixed size for all Occupational Certificates. Do you foresee any challenges with this approach?

- While flexibility is helpful, wide size variation complicates timetabling, funding, and staffing and could risk inequity between sectors.

Rationale (evidence):

- Providers report that significant size spread drives complex mixed timetables and uneven learner workloads.
- Funding bands may not track cost-to-deliver in capital-intensive subjects.

Suggestions AELP can support:

- Cluster sizes into a small set of standard bands (e.g., 300/420/540 GLH) tied to transparent funding rates.

We are proposing the size of the broad introductory core content should be proportionate and should be less than 50% of the overall guided learning hours (GLH). Do you foresee any challenges with this approach?

If so, what are they and how might they be overcome?:

- Too small a percentage of core content risks fragmentation and weak/limited transferability between routes.

Rationale (evidence):

- Learners who move mid-year need substantial common content to avoid repetition or loss of progress.
- A stronger set of core content/competency supports parity and clearer IAG.

Suggestions AELP can support:

- Set the core at 40–60% (for example), with nationally specified outcomes and exemplar assessments.
- Allow the remainder for local options and enrichment tied to employer needs.

Non-qualification activity

What non-qualification activities do you think are successful at supporting vocational students to engage best in their course content in order to achieve in their course and progress to their stated destination?

What non-qualification activities do you think are successful at supporting vocational students to achieve and progress to higher levels of study and employment?:

- Well-designed enrichment/non-qualification activity can boost engagement, wellbeing, and employability especially for Level 2 learners. We agree that
- Providers should have the flexibility to offer more varied non-qualification activity, however funding must ensure that this is funded appropriately as part of the funding model and that the non-qualification activity is valued as part of a learners progression/transition to employment and future learning.

Rationale :

- Sport, social action, and skills competitions (e.g., WorldSkills) improve confidence and soft skills and should be encouraged and funded appropriately.
- Providers are currently offering learners amazing opportunities however, much of this in reality is un-funded.
- Rural providers may need access to more flexible models (virtual encounters, mobile provision) to ensure equity.

Transition and branding

We plan to roll out V Levels, Foundation Certificates, and Occupational Certificates together by route, to ensure coherence across levels and clear progression.

Do you think this is the best approach?:

- Stagger implementation with realistic lead-in timescales, avoiding defunding of current qualifications before replacement routes are ready and recognised by HE/employers.

Rationale:

- Compressed timelines risk provider overload and mixed messages for learners, employers and universities setting entry criteria.
- Phased rollouts allow piloting, evaluation, and IAG readiness.

Are there alternative rollout strategies we should consider, or any unintended consequences we might be overlooking?:

- Adopt a three-year phased plan: Year 0 (specs, funding, HE alignment), Year 1 (pilot regions), Year 2 (national rollout).
- Issue a single national roadmap for CEIAG and HE to align offers.

What steps should we take to ensure the outline content for V Levels, Foundation Certificates and Occupational Certificates is high-quality across subjects and awarding organisations?

Please give us your views:

- Co-design with employers, providers, AOs, and gather feedback from HE for qualifications where transition to HE is the main planned destination. Test via pilots; and re-design based on feedback to ensure that all qualifications and content is fit for purpose. Ensure that this is

Rationale:

- Multi-stakeholder panels ensure relevance and feasibility; cyclical review maintains currency.
- Explicitly consider facility constraints and staffing availability in design.

Suggestions AELP can support:

- Support to establish route panels that include ITPs, AOs, SME and employers.

We're proposing that there is no awarding organisation branding for V Levels, Foundation Certificate and Occupational Certificate titles to make qualifications easier to understand.

Do you foresee any problems with this?:

- Removing awarding organisation branding without strong national branding risks confusion and undermines recognition among HE and employers. We understand that a single licence model (similar to T levels) is still under discussion and ask that DfE consider some of the concerns providers and learners have raised previously. Significant change has been underway in the post-16 sector over the last few years and this has undoubtedly led to confusion. For example, some Universities did not recognise T levels and many employers, particularly in the construction sector still hold awarding organization qualifications in high regard. Therefore, it is imperative that consideration is given to how each destination organisations view, understand and value these proposed new qualifications.

Rationale:

- Brand equity helps stakeholders interpret quality; a vacuum can reduce confidence at launch.
- Consistent national messaging is essential for parity with A Levels and T Levels.

How could we mitigate these?:

- Creation of a clear national V Level brand toolkit and style guide; mandate consistent naming on certificates for example to ensure equity.
- Run a public information campaign linked to UCAS search and employer bodies to cement recognition.

Equalities impact

Could any of the proposals have an impact – positive or negative – on people with any of the following protected characteristics?

Age, Disability, Pregnancy and maternity, Religion or belief, Sex

Please explain your answer.:

- Rural and coastal learners may face unique barriers to accessing provision within a reasonable distance and also face barriers accessing placements. In addition, providers are struggling to attract teachers and trainers, there is the potential that due to locality learners may not be able to access training in an area of their interest. Travel and the distance a learner is away from their provider can be pivotal in assessing which course they might study. For example, a young carer or individual with health concerns might find it difficult to find a provider and course for them. Therefore, funding and delivery models must enable providers to develop and deliver innovative training programmes. NEET figures continue to impact
- disadvantaged young people more acutely and therefore, flexibility to use locally economic data to support the design and implementation of delivery is a must.

What action could help reduce any negative impacts you identified in the previous question?

Please give us your views:

- Offer placement flex (shorter, more frequent encounters; project-based alternatives) with quality criteria.
- Propose specialist hubs and collaborative working between provider types to ensure that all learners have access to a training environment to support them. E.g., ITPs and Colleges could develop a joint offer where the study pathways are defined between the organisations to ensure that all learners can access training effectively.

Are there elements of V Levels or Foundation and Occupational Certificates that are required in your view to increase accessibility or improve outcomes for those with SEND?

Please give us your views:

- Design for inclusion: large vocational programmes and applied assessment can level the playing field for SEND and disadvantaged learners.

Rationale (evidence):

- Over-reliance on high-stakes exams disadvantages some groups; applied, modular assessment supports ongoing achievement.
- Access to placements (for example) and facilities must not depend on postcode and ability to travel to facilities.

Suggestions AELP can support:

- Mandating inclusive assessment design and reasonable adjustments from the outset.

Are there any other equality-related impacts you think we should consider?

Please give us your views:

- Key risks include policy churn, HE misalignment, employer confusion, and provider capacity; mitigations hinge on pacing, clarity, and resourcing.

Rationale:

- Frequent reforms erode trust and makes it difficult for learners and employers to fully understand the qualification landscape. For example, will a qualification studied from 2026 be valued in the same way as a new qualification studied from Sept 2027 and how can you distinguish between the two?
- Unclear HE recognition at launch has the potential to undermine learner confidence.

Suggestions AELP can support:

- Commit to a stability period post-rollout with no major structural changes.
- Fund transition support (CPD, capital where essential) and publish HE alignment statements and employer briefs before first teaching.



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