

Written evidence submitted by the National Foundation for Educational Research (NFER)

1 Introduction to NFER

1. NFER is the UK's leading independent provider of educational research.
2. NFER's significant expertise in the post-16 education and training sector informs the vocational and technical education policy discourse through research, conference presentations, consultations, contributions to policy and practice development, and knowledge exchange through networking.

2 The experience to date of those taking or delivering T Levels, and any changes to T Levels that may be needed to ensure they are accessible to all students

3. In the T level Action Plan 2021, T Levels are described as 'rigorous' and 'high-quality' two-year post-16 technical qualifications which are equivalent to three A Levels. Despite the pandemic, the anecdotal evidence to date is that they are performing well and that students are satisfied with their experience¹. However, they are large and challenging specialist qualifications – considered by many providers participating in NFER's research to be a Level 3.5 - and they are not suitable for all young people.
4. T Levels include 1,800 guided learning hours with a significant 45-day industrial placement and these hours will prove too demanding for some young people, particularly those with caring responsibilities and who need to work part-time to support themselves or their family.
5. Up until recently, the Department required students to have passed GCSE English and maths at grade 4 or above to be awarded a T Level certificate. Although this requirement has now been removed, for many T Level programmes, students will need this level of literacy and numeracy to be able to manage the demands of the programme, including the employer-set project. The evidence to date is that most providers are requiring students to have

¹ For example, from T Level national conferences, FE Week and other press articles, provider case studies such as this one written by Gatsby and NFER's contact with providers.

GCSE grade 4 or above in English and maths (and sometimes higher in maths) to get onto a T Level programme because they feel this level is required for success and they do not consider there is sufficient time for students to retake these subjects as well as cover all of the other elements on the programme. Within this context, the T Level Transition Programme provides a one-year preparation for T Levels, supporting students to improve their skills in English and maths with a view to them progressing onto a T Level if they achieve the required level.

6. T Levels prepare students for a particular role within a sector and they are not suitable for all young people choosing a vocational/technical route at 16/17 years. Many young people seek to retain breadth to their studies at this stage, particularly as many do not have a clear idea of the career they want to pursue.
7. During the first year of T Level delivery, providers faced difficulties in securing the necessary industrial placement hours for students. NFER's T Level research uncovered providers' concerns regarding securing placements prior to delivery and their challenges have been exacerbated by Covid-19, with schools and sixth form colleges finding this element particularly challenging.
8. The Department could tackle all of the aspects which make T Levels difficult to access for many young people. However, making further adaptations to the T Level specification would mean that they would no longer provide the 'high-quality' and specialist technical route, equivalent to three A Levels, which was their original function. Their role has already been adapted with the establishment of a route to university when they were originally envisaged as a route into employment only. We do not think that T Levels should be adapted further or they will lose their points of difference to other routes. Instead, they should sit alongside other high-quality vocational/technical qualifications, which offer a breadth of vocational study and offer more flexibility in terms of the number of guided learning hours, study mode and the length of placement.

3 The strengths and weaknesses of the current system of post-16 qualifications in preparing young people for work or further and higher education

9. The strengths of the current system are that it provides young people with a range of academic and vocational post-16 options into further study (for example a degree) or employment and it caters for a range of learning styles which is key to social mobility:

- A Levels provide a longstanding and respected academic option which effectively prepare young people for further study or training, primarily at university
 - Applied Generals (e.g. BTEC Nationals and Cambridge Technicals) provide broad vocational study and are increasingly studied in combination with A Levels. They are generally well regarded by universities and employers alike, allowing progression to a degree or employment. A number of Applied Generals incorporate a licence to practice, which are particularly highly valued by employers as a preparation for employment
 - Apprenticeships provide specialised training for employment in a particular role
 - T Levels prepare students for specialist roles in the labour market or to enter specialist degree courses.
10. The long-reported drawbacks of the current system are that there are far too many full-time vocational options, that the system is complex and confusing, and that some of the courses are of poor quality. However, these issues have started to be addressed over recent years with low-quality programmes and those for which there is low demand being de-funded.
11. A recent study by Oxford Brookes University funded by Nuffield reported that around one in four English students entering UK universities have studied a BTEC or a combination of A Levels and BTECs, with 40 per cent of the least privileged quintile of recent cohorts entering university with BTECs compared with less than a tenth of the most privileged. Most BTEC students perform well and graduate with at least a 2.1. However, they were shown to be almost twice as likely to drop out as a similar 'average' A Level student, 1.7 times more likely to repeat a year in the same subject at the same university and 1.4 times more likely to graduate below a 2.1. BTECs play a key role in supporting social mobility and these findings point to the need for more support for BTEC students to help them succeed at university.
12. Apprenticeships have the potential to act as a vehicle for social mobility for young people. Recent estimates from the Social Mobility Commission suggest that disadvantaged young people with an apprenticeship qualification earn, on average, over ten per cent more by age 28, compared to individuals holding a same-level qualification.
13. A key issue in terms of apprenticeships is the well-documented decline in the number of opportunities available for 16-19 year olds since the reforms, which has been further exacerbated by Covid-19. As noted in NFER's recent apprenticeship report, between 2015/16 and 2018/19, apprenticeship starts declined by 23 per cent for those under the age of 19, and starts for under 19 year olds declined by two-thirds between March-August 2018/19 and March-August 2019/20. Similarly, data from IfATE prepared for the House of Lords

Youth Unemployment Committee showed that, in the year to mid-July 2021, a total of 142,124 candidates under 25 years submitted at least one application under the Find An Apprenticeship (FAA) service with just 9,587 having an application marked as successful.

14. This evidence shows that, unless existing issues relating to apprenticeships are overcome, they are not an available option for most young people and do not provide them with the number and breadth of opportunities that they require. Indeed, apprenticeships currently only account for a relatively small share of the qualifications undertaken by young people. Among 17 year olds in full-time education or an apprenticeship in 2019, only seven per cent were studying an intermediate or advanced-level apprenticeship as their highest qualification aim.
15. T Levels provide a technical option equivalent to three A Levels but they are a specialist route for small numbers of highly-qualified young people who are clear about their career direction and can cope with the demands of a large qualification. They are in their early stages of delivery and are serving small numbers of young people, with around 5,450 young people starting T Levels in 2021 and around 1,300 in 2020. The current demand for T Levels is not as expected, with a recent FE Week investigation finding that nine in ten providers had missed their T Level recruitment targets in the 2021/22 academic year. This suggests that they are appealing to a small sub-set of young people aged 16/17.
16. There also remains some uncertainty around which universities will accept T Levels and for what courses, which will deter some young people from taking them. The DfE recently published a list of 80 higher education providers which will accept T Levels for entry on one course. As a recent FE Week article pointed out, 66 of these are traditional universities which leaves over 50 per cent of traditional universities yet to decide, including ten of the 24 Russell Group universities. This is within the context of the first T Level students applying to start university in September 2022 and the UCAS 26th January deadline fast approaching. A recent report by London South Bank University and Aston University also noted that the 'proposed defunding of Applied Generals is also likely to prevent many potential students from progressing into technical qualifications at universities' and that 'while the concept behind T-Levels may have been to support higher technical education, the result if implemented alongside a defunding of Applied Generals, is likely to do the opposite'.
17. It is also worth noting the current lack of high-quality and specialist careers education, information, advice and guidance (CEIAG) in schools which young people require to make decisions around entering vocational and technical routes post-16. In addition, the Baker Clause, which requires schools to

publish a statement online describing their careers programmes and how providers access their pupils to talk about technical education and apprenticeships, has not been effectively actioned though steps are being taken to strengthen its application. On this theme, a recent CEC report commented: 'There remains work to do to meet growing student demand for more detailed information about all non-academic pathways, including apprenticeships, and addressing the barriers to translating interest into uptake'. Youth Employment UK's 2021 Youth Voice Census found that many young people say they have never had traineeships (65.6 per cent), T Levels (72.7 per cent) or apprenticeships (14.2 per cent) discussed with them at school. To be able to make decisions about vocational/technical study post-16, young people also need access to relevant work experience and considerably more interactions with employers and the world of work to inform and support their career decision making.

4 The benefits and challenges the Government's proposed changes to Level 3 qualifications would bring

18. The proposed reforms need to be considered in the context of the need to address existing and upcoming skills needs. We cannot afford the widespread social and economic consequences of stumbling into the next 10-15 years without a long-term skills strategy which both ensures that people can access appropriate education and skills training to secure work and flourish in their jobs and helps to ensure a prosperous future for our economy and society. But, future skills needs are not currently well understood. Our Nuffield Foundation funded research programme, Skills Imperative 2035, will provide practical evidence-based insights to inform this long-term planning which needs immediate attention.
19. The theory behind the proposed changes to Level 3 qualifications is the raising of the quality and standard of all Level 3 qualifications but this is set against a range of challenges.
20. The proposed changes will provide able students with good GCSE grades, a clear career direction and the ability to cope with a large qualification with a high-quality technical qualification (T Level) as an alternative to A Levels. Alongside this, they will provide employers with well-qualified potential recruits who have a good understanding of their sector and the world of work as a result of undertaking a significant industrial placement. However, we, and many others, feel strongly that high-quality Applied General qualifications need to be retained to sit alongside T Levels and A Levels. In its response to

DfE's consultation on post-16 qualifications, the government acknowledged that 86 per cent of respondents opposed the proposals to defund qualifications that overlap with T or A Levels. Also, in his opening speech to mark the second reading of the Skills and Post-16 Education Bill, Nadhim Zahawi noted the importance of retaining these qualifications which 'play a valuable role in supporting good outcomes for students'.

21. A key issue with the proposed defunding of Applied Generals is the significant obstacle of young people requiring grade 4+ in English and/or maths to be accepted onto, or to be able to successfully complete, many Level 3 programmes, including apprenticeships. Although the requirement for young people to have English and maths grade 4 or above to achieve a T Level qualification has been removed, it is likely that they will need this level to successfully achieve a T Level. In addition, T Levels are large qualifications which leave little time for GCSE retakes. However, through an additional year of study, the T Level Transition Programme provides the support for students to improve their skills in English and maths with a view to achieving the grades they require for T Levels when they retake them.
22. Regarding apprenticeships, recent research by NFER analysing vacancies advertised on the Find An Apprenticeship (FAA) service website found that 84 per cent of Level 3 vacancies advertised on the website between August 2018 and October 2021 mentioned English or maths GCSE as a qualification requirement. This leaves many young people seeking employment with few options but to go into low-skilled work, some offering zero hours contracts.
23. Another key issue is the academic nature of A Levels and T Levels which, in the current proposals, would be the two main routes for young people who want to remain in full-time education following GCSEs. NFER's research on T Levels reports the 'significant demands' of this technical qualification equivalent to three A Levels, with some providers and sector representatives perceiving it to be nearer to a Level 3.5 than a Level 3.
24. Defunding BTECs/other Applied Generals will remove the option for students to take a broad vocational programme – as opposed to a specialist T Level. This type of study has suited the needs of many young people for many years and led to a strong demand for these types of qualifications. The numbers speak for themselves with an estimate in a letter signed by a cross-party group of 118 MPs and peers that at least 30 per cent of 16 to 18-year-olds studying a Level 3 qualification in England take Applied General qualifications, amounting to approximately 259,000 young people. To reflect the fact that many young people do not know what specific career they want to pursue at 16/17, to allow young people a breadth of choice, to meet demand and to continue to support social mobility (more on this in the response to the question below), it is crucial to retain high-quality Applied General qualifications.

5 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

25. Recent research by EPI funded by Nuffield has found that the disadvantage gap is substantial during the 16-19 education phase, with poorer students continuing to see far worse educational outcomes than their better off peers, with poorer students in some areas of England being the equivalent of five whole A Level grades behind their peers. Similarly, the Social Mobility Commission found that disadvantaged groups are more likely to choose low-earning courses, regardless of prior attainment, and that they would benefit from better careers advice. DfE's impact assessment concluded that 16 to 19-year-olds who are male, from Asian ethnic groups, have a history of SEND support or are from a disadvantaged background are more likely than other young people to be disproportionately impacted by the proposed changes to Level 3 qualifications.
26. The proposed defunding of many larger BTEC and Cambridge Technical qualifications (i.e. those equivalent to two or three A Levels) will leave young people wanting to remain in full-time education with the main choices of either A Levels or T Levels. This will have a significant detrimental impact on young people from a range of backgrounds and with a range of needs.
27. Firstly, young people seeking a vocational route who have caring responsibilities or whose family rely on them having a part-time job will find it challenging to manage the size and demands of a T Level. This includes funding travel to the 45-day industrial placement. It is also worth noting that this group also tend to be excluded from apprenticeships, given there are very few part-time opportunities.
28. Secondly, only half of all young people from disadvantaged backgrounds (as measured by eligibility for free school meals) achieved a grade 9-4 in English and maths at Key Stage 4 in the last academic year. The requirement for these grades set by many education and training providers for entry to A Levels and apprenticeships, and needed to manage the demands of a T Level, mean that these routes are not realistic for many disadvantaged young people, leaving them with few options.
29. Thirdly, defunding Applied General qualifications (such as BTEC and Cambridge Technical Diplomas and Extended Diplomas) will have a detrimental impact on social mobility as these qualifications play a key role in

widening diversity and broadening inclusion in education. In particular, they provide a key progression route to university for many disadvantaged young people, with a higher proportion of BTEC than A Level students coming from disadvantaged backgrounds and BAME groups and being the first in their families to go to university². Many BTECs are also highly valued by employers and, as suggested by Bill Watkin of the Sixth Form Colleges Association, no funding should be withdrawn from BTECs unless 'there is clear evidence' that they are not valued by students or employers.

5.1 Suggested measures to mitigate any negative impacts

30. Level 3 vocational qualifications

- Reconsider the decision to defund tried and tested and valued Level 3 vocational qualifications for which there is an ongoing demand and good progression routes to employment and university.

31. Level 2 qualifications

- Improve the variety and quality of Level 2 qualifications.
- Provide more effective support for students to achieve grade 4+ in GCSE English and maths retakes (or the equivalent) to support entry to Level 3, drawing on some of the best practice in English and maths provision identified within the T Level Transition Programme. Although retake pass rates increased between 2020 and 2021, more than half of these learners are not achieving a grade 4+ (42.3 per cent over 17s achieved a grade 4 in English in 2021 and 39.6 per cent achieved this level in maths).

32. Apprenticeships

- Increase the number and variety of apprenticeships at both Level 2 and 3 and target them at young people aged 16-24 who are entering the labour market (as opposed to existing employees aged 25+ or graduates). Within this context:
 - re-design the funding system to better support the needs of SME employers who are more likely to offer intermediate and advanced apprenticeships
 - separate and protect funding for training 16-18 year old apprentices from the main apprenticeships budget.

² Evidence for these points on BTECs can be found in Reforming BTECs: Applied General qualifications as a route to higher education by Scott Kelly at the Higher Education Policy Institute; Vocation, Vocation, Vocation: The role of vocational routes into higher education by the Social Market Foundation; the blog: How successful are BTEC students at university? by Pallavi Amitava Banerjee from the University of Exeter; and the recent Oxford Brookes University report on Educational Choices at 16-19 and Outcomes at University mentioned above.

- Offer greater incentives (e.g. financial assistance) to employers to take on young people aged 16-24, including those without GCSE English and maths grade 4+ (or the equivalent). Alongside this, re-assess how functional skills training is incorporated into apprenticeships.
- Encourage more employers to advertise apprenticeships through the Find An Apprenticeship (FAA) website and provide support to young people from disadvantaged areas applying via this website.
- Raise the profile of traineeships given they are an important entry route for young people into the lower level apprenticeships and can support the development of functional skills which can be a key barrier to entry.

33. CEIAG

- As recommended in Skills for every young person (2021), provide better careers education, information, advice and guidance (CEIAG) pre-16 as well as employer input in education and work experience to ensure disadvantaged students are informed about, and prepared for, high-quality vocational and technical options. As part of this, ensure that the Baker Clause is enforced so that young people are informed of the Level 3 vocational and technical routes they might pursue as an alternative to A Levels.

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