

**BACH's response to
Department for Education; Review of post-16 qualifications at level 2 and below in England
Government consultation
Launch date 2 March 2022; Respond by 27 April 2022**

Questions 1-5 in the online survey ask for information from respondents such as their name, email address and the organisation they represent.

Question 6:
i) Do you agree that we should fund qualifications that support progression to level 3 technical provision?
Yes
ii) Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-240 GLH?
No
<p>We are making a general comment which applies to all our answers.</p> <p>Whilst we recognize the need for change for digitisation and net-zero etc. and need for simplification of the skills system for employers.</p> <p>In this respect we feel that new Level 2 qualifications must match the KSBs in the occupational standards or NOS where there is no occupational standard. These will need to be readily updated for digitization and net-zero skill changes.</p> <p>There will be a major retention problem if the qualification has to be taken over two years and we would be concerned if some-one left after one year with nothing. Greater flexibility is needed. This could be either through smaller qualifications or fully funded modularisation of a larger qualification.</p> <p>It is not clear how progression into work can be achieved if a learner cannot progress at the end of a qualification on to a full-time apprenticeship and a T Level is not appropriate. We need some for bridging qualification for these circumstances.</p> <p>It is not clear how apprenticeship funding will work if a learner in effect learns all of the KSBs in the college course and qualification. There would be no funding left for the in-work component of any apprenticeship. If this is case then what's the incentive for an employer to take on apprentices?</p> <p>Level 1 and below qualifications are critical to support progression to further learning or employment/apprenticeships. They to need to be based upon KSBs in the occupational standard or NOS so they provide a clear stepping-stone. These types of qualifications must include soft/social/employability skills. These qualifications must be small or modularised to allow the learner to progress and feel they are achieving.</p> <p>These policy proposals seem to be primarily for young people, that are in full-time education taking large courses; which would result in them getting their first job or adults that need a significant amount of training. There appears to be a constant bias towards academic type classroom delivered qualifications through-out the document. This is not applicable to adults and young people that are developing practical skills and competencies and those have learning challenges.</p> <p>It is interesting to note that one of the general messages from the first batch of LSIPs published say "Employers find the skills system too complex, qualifications lag behind advancements in</p>

industry, formal courses are too big and time-consuming, tutors aren't up-to-date, and SMEs feel systematically excluded". The proposals set out in this consultation do nothing to address these challenges, in fact they are moving in the opposite direction. We feel that these proposals will damage the economic recovery and make social mobility more difficult.

In this context we do not feel that the policies outlined in the consultation address the major economic challenges the country faces and will not support the leveling up agenda to reskill a construction operational workforce of some 1.3 million adults with short duration qualifications or modules of a qualification at Level 2 and below.

There is a need to allow people to build up knowledge through smaller qualifications, demonstrating progression and increased knowledge. This applies to some young people as well as adults.

Smaller qualifications and funded units/modules are needed if leveling up is to be properly supported so range should start at 30 GLH, specifically for adults as well as young people needing the additional support.

Policy proposals needs to recognise that not everyone will progress to Level 3, particularly in construction where the vast majority of operational jobs are at Level 2 and some below i.e. some 1.1 million out of a total workforce of 2.4 million including mgt/prof/tech jobs. Level 2 is a legitimate goal for many as well as a stepping-stone towards an ultimate Level 3.

Specifically in construction we consider that there is no evidence that the proposals support the longstanding career pathways nor the major impact of skills shortages, and the digitisation and net-zero requirements in respect of upskilling of for example at least 1.3 m adults in the construction sector. The needs for economic regeneration (building back better/leveling up) do not appear to have been considered. In fact, one is left with the impression that, if the proposals set out in this consultation document are implemented, the Department of Leveling up, Housing & Communities will need its own separate skills programme and separate set of qualifications and funding in addition to the Multiply Programme already announced. This does not appear desirable.

We are not clear if the proposals recognise that in construction many occupations do not have an apprenticeship standard and in fact for many of these occupations an apprenticeship standard is unlikely to be viable. Accordingly, it is critical that we have small to large qualifications from Entry through to Level 2 that support learners, including adults, that are never going to go through an apprenticeship.

Qualifications are needed at Level 2 and below to give learners a sense of real achievement and provide them with evidence for job movement between employers.

Smaller and modularized qualifications are vital for social mobility.

We think it is critical that the Department through its agency the ESFA continue to fund arrange of small qualifications or units/components/modules at Level 2 and below for 16-19 yrs and adults. If funding is withdrawn, then we think there will be damage to the economy and social mobility.

Question 7:

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

Yes

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

Yes

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

No
Your premise that the training must be classroom based is fundamentally flawed for practical competency based occupations and will not work. It looks to be repeating the policy error of the 14-19 years diplomas developed in the early part of this century.
It needs to be appreciated that not all occupations have an apprenticeship standard so practical competency based qualifications are needed for these types job.
We need small to large construction qualifications, and modularised qualifications, for many sectors which also support upskilling and leveling up, see Question 6.

Question 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; **OR**
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?

Please give reasons for your answer.

Option B

We are not clear whether, when you are saying two different occupational routes, you mean routes in the sense of IfATE's definition which for many people means 'sector'. If it does have the IfATE meaning, then we would say NO to funding this type of qualification as we can see no reason why a qualification might cover hair-dressing and bricklaying!
However, there are circumstances where it might be appropriate for two different occupations within the same sector/IfATE route to be funded in a broader foundation qualification. In some sectors there are occupations which are single trade specific and others that require multi-tasking. For example, in construction both options are needed; a person that is working on a heritage building will need a high level of a specific trade skill. However, some-one employed on housing maintenance will need a lower level of competence in several trade areas.

Question 9:
 i) 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

ii) If you believe there are any groups of students or occupational routes for which a substantial qualification taken as part of a two-year study programme would be unsuitable, please provide details.

Some learners may be able to go onto a Level 2 apprenticeship after just one year in college, with a traineeship or bootcamp period at the end.

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

Yes

If you agree, are there any examples of qualifications that you think might fall into this group?

There are a very wide range of specialist occupations in construction and the built environment which where an apprenticeship is not viable and hence specialists level 2 qualifications are needed e.g. steeplejack, chimney engineering, mastic application etc..

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

Yes

If you agree, are there any examples of qualifications that you think might fall into this group?

As mentioned previously housing maintenance is a good example of the need for a multi-skilled

<p>person. As present there is no published standard for this type of occupation; although we appreciate that might change over time. Whilst there is no standard in place we need to have qualifications.</p>
<p>Question 12:</p>
<p>i) Do you agree that we should fund qualifications to support progression to specialist level 3 academic qualifications?</p>
<p>No</p>
<p>ii) Do you agree that qualifications in this group should be small-medium sized, with a guideline size of 120-240 GLH?</p>
<p>No There are very few academic occupations of this type so is there a real viable need for this? There is a need to have qualifications to take for example a person who has achieved a Level 2 apprenticeship to learn higher technical practical and competency based skills together with for example some supervisory skills. However, these would not be described as 'academic'. We are not sure of the viability of an academic 'top-up' to Level 3 which is not either an A Level, a T Level or an Access to HE Diploma.</p>
<p>Question 13:</p>
<p>i) Do you agree that we should continue to fund level 2 performing arts graded exams in their current form?</p>
<p>N/A</p>
<p>ii) Do you agree that we should continue to fund level 2 Higher Project Qualifications in their current form?</p>
<p>N/A</p>
<p>Question 14:</p>
<p>i) 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?</p>
<p>Yes</p>
<p>ii) Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-280 GLH?</p>
<p>Yes But the qualifications should be flexible and modularised as some students e.g. adults, may need less than 120 GLH. Maximum flexibility is needed to support a very broad range of learners with very different requirements. You will need to fund the individual modules.</p>
<p>Question 15:</p>
<p>Do you agree that we should fund level 1 qualifications which act as a prerequisite to employment?</p>
<p>Yes The Level 1 occupational traineeship and Bootcamp qualifications in construction are excellent examples of this working in practice.</p>
<p>Question 16:</p>
<p>i) Do you agree that we should continue to fund level 1 graded qualifications in performing arts in their current form?</p>
<p>N/A</p>
<p>ii) Do you agree that we should continue to fund level 1 Foundation Project Qualifications in their current form?</p>
<p>N/A</p>
<p>Question 17:</p>
<p>i) Do you agree that we should fund entry level 3 pre-technical qualifications that support progression to level 1 study?</p>
<p>Yes</p>

ii) 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 Qualifications should be flexible and modularised as some students may need less than 120 GLH. Maximum flexibility is needed to support a very broad range of learners with very different requirements. You will need to fund the individual modules. This will be an access point for those who are economically inactive and wanting to move into employment in construction. L1 is too high for some learners to start to get on a study programme and then progress to a course which takes them into a construction occupation. If we cannot take learners in at this lower level and bring them through, we will start to reduce the flow of recruits into the construction industry. This will damage the economy and hold back recovery.

Question 18:
Do you agree that we should continue to fund entry level graded qualifications in performing arts in their current form?
N/A

Question 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 But we have to recognise that we do not have apprenticeship standards and hence occupational standards and pathways for all the occupations in the economy. Accordingly, we cannot solely link these types of qualifications to the apprenticeship standards.

Question 20:
Do you agree that we should fund the following level 2 qualification groups for adult learners:
Group 1: Qualifications supporting progression to level 3 technical study
Group 2: Occupational-entry qualifications
Group 4: Specialist qualifications
Group 5: Qualifications supporting cross-sectoral skills
Group 7: Qualifications supporting progression to level 3 academic study
Yes For Groups 1 to 5 and these must be modularised; with funding for both the qualification and the component modules. We are not convinced that Group 7 is viable, unless this is to cover a limited number of learners on pre-Access to HE courses in construction.

Question 21:
i) Do you agree that we should fund occupational-focus qualifications at level 2 for adults?
Yes
ii) Do you agree that these qualifications should be medium sized, with a guideline size of 200-540 GLH?
Yes But the qualifications should be flexible and modularised as some students may need less than 120 GLH. Maximum flexibility is needed to support a very broad range of learners with very different requirements. You will need to fund the individual modules as well as the qualifications.

Question 22:
i) 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
ii) Are you aware of any occupations that are in demand by employers but where an employer-led occupational standard does not currently exist?
There are a very wide range of specialist occupations in construction and the built environment

which where an apprenticeship is not viable and hence specialists level 2 qualifications are needed e.g. steeplejack, chimney engineering, confined spaces, energy efficiency, hybrid wall installation, insulation & treatments, land drilling, mastic application, retrofit etc.. These are all driven by CITB's NOS which is developed with industry and hence employer led. They must continue.

iii) Do you agree that these qualifications should be available to adults only?

No

Question 23:

Do you agree that we should fund the following qualification groups at level 1 for adult learners?

Group 9: Level 1 pre-technical qualifications supporting progression to level 2 study

Group 10: Level 1 qualifications serving as a prerequisite to employment

Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications

Yes

These would support employability skills, traineeships, study programmes with a focus on employment or the early stages towards an occupation or a Level 2 apprenticeship. We find it strange that the performing arts sector is specifically prioritised in the consultation when other sectors are not, such as construction where skill shortages are crucial for economic recovery and leveling up.

Question 24:

Do you agree that we should fund the following qualification groups at entry level for adults:

Group 14: Entry level 3 pre-technical qualifications supporting progression to level 1

Group 15: Entry level performing arts graded qualifications

Yes

These would support employability skills, traineeships, study programmes with a focus on employment or the early stages towards an occupation or a Level 2 apprenticeship. We find it strange that the performing arts sector is specifically prioritized in the consultation as opposed to the crucially important construction sector.

Question 25:

i) Do you agree we should remove funding at **level 2** for non-GCSE/FSQ **English** qualifications?

No

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

No

Question 26:

i) Do you agree we should continue to fund **level 1 and entry level English** qualifications for learners who cannot access FSQs/ GCSEs?

Yes

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

Yes

Question 27:

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

Yes

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

Yes

Question 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

Question 29:
Do you agree that we should continue to fund ESOL qualifications at each of the following levels:
i) Level 2
ii) Level 1
iii) Entry level (including sub levels 1, 2 and 3)
Yes to all

Question 30:
Do you agree that we should develop national standards and set broad core content at level 1 for:
i) Personal and social development
ii) Employability skills
iii) Independent living and life skills
Yes to all

Question 31:
Do you agree that we should develop national standards and set broad core content at Entry level (including entry level 1, entry level 2 and entry level 3) for:
i) Personal and social development
ii) Employability skills
iii) Independent living and life skills
Yes to all

Question 32:
Do you agree the national standards set out above will cover the range of skills needed by students?
Yes
Do you believe there is a need to develop additional national standards? If so, please tell us what the standard should contain and which students it would benefit?
Yes

Question 33:
Thinking specifically about employability skills
i) As an employer, do you currently recognise or value any qualifications in employability skills? If so, how do you recognise them and what aspects of these qualifications do you value?
Yes We do value these including all the aspects we would expect to fall under this definition including but not limited to communications, values and behaviours, customer service, time-keeping, project management, cognitive skills, self-awareness, numeracy, team-work, 'work-ethic' etc.. Digital and awareness of green issues would form part as well.
ii) Will the proposed national standards make a difference to the way these qualifications are perceived, valued or recognised by employers?
N/A to us
iii) If so, what difference will they make and how would employability qualifications aligned to standards be used by employers in the future?
N/A to us

Question 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?

Possible at Entry, Level 1 but at Level 2 you would expect more focus

Question 35:

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

Support is definitely required. Whilst needing to see the detailed implementation plan, we would expect piloting in a limited area to happen rather than a 'big bang' across a whole sector or even all sectors. Having a phased implementation and a lot more detail and context is important to be able to comment fully. Until we are clear on the proposals and implementation plan we think it is unwise for the Government to set firm deadlines and timescales.

With the approval process being so lengthy this could delay the developments. Following approval colleges will need two years to mobilise and recruit to the courses and this time period needs to be built into the project plan.

Question 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 a protected characteristics under the Equality Act 2010?

Need to see the detailed proposals.

Qualifications at E1 and E2 are very important for SEND learners as well as ESOL, alternative provision and those with gaps in their education. By limiting these it will impact on overcoming the barriers to social mobility.

Question 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?

More detail on mitigations for SEND and LLD learners is required before we can fully comment.

Need to take into account social mobility here, levelling up, don't reduce entry points.

Widen the access with regulated valuable quals at Entry levels in order to increase the flexibility for learners.