



QAA response to the Department for Education Consultation: Review of post-16 qualifications at level 3 and below in England

The first stage of the Government's review of post-16 qualifications and level 3 and below in England sought views on the high level principles and outline proposals. The consultation closed on 10 June 2019. QAA's response focused on the Access to Higher Education Diploma, the Level 3 qualification that prepares people without traditional qualifications for study at university. Our responses to the [consultation questions](#) were as follows.

How could we extend this clarity of purpose to all qualifications at level 3 and below so that the intended outcome for the student is clearer? Please give reasons for your answer, including any examples of how this may be achieved.

The Access to Higher Education (HE) Diploma is a qualification which prepares students for study at degree level. It is intended primarily for people who want to go to university but left school without the qualifications to do so.

The Quality Assurance Agency for Higher Education (QAA) licenses awarding bodies, known as Access Validating Agencies (AVAs), to award Access to HE Diplomas. Typically, the Diplomas are delivered by FE colleges, but they are also available at other venues, including council adult education services and prisons. Courses are offered full and part-time, through distance learning and evening classes.

Access to HE Diplomas are offered predominantly in England and Wales, with a small number delivered in Northern Ireland. A separate scheme for enabling access to a higher education course operates in Scotland. In May 2019, The Independent Panel Report to the Review of Post-18 Education and Funding made reference to the value for money the Access to HE Diploma provides, and to its positive impact in widening participation.

Access to HE has a clear and defined purpose: it is a Level 3 qualification that is designed with the express purpose of facilitating entry to a higher education programme. Historically, the qualification has been aimed at older learners who have been out of formal education for some time. However, we are seeing increasing numbers of under 25s choosing an Access to HE programme (20,037, or 47%, of total learners in 2015-16 vs 19,825, or 54%, of total learners in 2017-18). Nineteen thousand, one hundred and seventy eight (58%) of publicly funded Access to HE students in England already have a Level 3 or above qualification in 2017-18. The data suggests that the demographic of the 'traditional' Access student is shifting, with younger learners viewing Access to HE as an alternative to other Level 3 qualifications like A Levels. It could also be symptomatic of confusion about the purpose and suitability of other Level 3 qualifications.

We particularly commend the statement in paragraph 20 that there can be no one-size-fits-all approach to adult qualifications, because of the diverse needs and aspirations of adult learners. Measures to define and clarify the purpose of a particular qualification are important to aid student choice. However, we would caution against an overly prescriptive approach to defining a qualifications purpose, if it leads to learners feeling that it would not be suitable for them.

Are standalone qualifications in personal, social and employability skills necessary? Please give reasons for your answer and tell us if there are other changes we should explore to support these skills being delivered in other ways. Please make clear if your answer varies in relation to different student groups, such as adults or those with SEND.

Every Access to HE Diploma has employability built into its specification and many Diplomas are specifically designed to support progression to graduate positions in professions like nursing and allied careers.

However, standalone qualifications in personal, social and employability skills may be of benefit to some learners on other routes.

What additional evidence or data could we use to determine whether current qualifications or types of qualifications, including Applied General qualifications, are delivering successful outcomes?

Data on skills gaps would help colleges and awarding bodies develop and design new education programmes that could help to plug those gaps and support the skills and employment needs of both the nation and their local area.

We would also welcome an accurate and timely method of following cohorts through education to employment.

We recognise the difficulty in doing this, particularly when balanced with data protection and privacy requirements.

How could we better use data about student outcomes to monitor and assess the success of future qualifications?

Students' progression and achievements after completion of a qualification are important. Most students embark on a qualification to unlock their potential and progress in their chosen careers. Good data about how students progress is vital, not just for policymakers, but also for prospective students who need good information to support good decision making.

The complex landscape of Level 3 and below qualifications can make progression data difficult to collect consistently, but we would strongly recommend that the progression field in the Individualised Learner Record (ILR) be made a mandatory data field, and that returns of a large number of 'unknown' entries should be discouraged and, if necessary, investigated.

For qualifications that facilitate entry to HE, the rise in unconditional offers from universities could be leading to withdrawal from lower level qualifications. UCAS's end of cycle report for 2018 noted that 34.4 per cent of 18 year old applicants from England, Northern Ireland, and Wales yet to complete their school or college study received an offer that 'could be considered unconditional'

(www.ucas.com/corporate/news-and-key-documents/news/unconditional-offers-made-third-young-applicants-england-northern-ireland-and-wales). While not all of these applicants will have left their studies, it is possible that some choose to. If people do withdraw from their studies but take up their place on an unconditional offer, it may be skewing data about progression rates.

Are the quality features listed under paragraph 55 the right starting point for framing future quality requirements for publicly funded qualifications? Please give reasons for your answer.

Most of the features listed under paragraph 55 seem sensible, although we feel that an additional element of student engagement could be included. However, we disagree with the way in which 'proven track record' is defined. By requiring at least 100 students aged 16-19 to enrol in the first two years, this could disadvantage niche, but economically important subjects that do not attract so many students. Equally, emerging industries and skills needs might require innovation in the curriculum, making it difficult to demonstrate a track record.

It is also important to consider that a low enrolment may be appropriate for some areas of study. A highly skilled but niche trade or professional area may only sustain a limited number of jobs. In such cases, there is a risk that the size of a student cohort might not match the job market for highly skilled trades and professions. If an awarding body or college is incentivised to recruit more students to avoid falling foul of this low enrolment measure, without considering the needs of the job market, holders of a qualification may not be able to find work in their chosen field.

We also note the following aspects of some of the quality features:

Recognition - a useful measure, and we would recommend that professional, statutory and regulatory bodies are included in any discussions about how qualifications are recognised externally.

Size - QAA cautions against guided learning hours as a quality measure, as it can be misleading for programmes that include a significant amount of self-directed study. This is particularly important for Access to HE, which prepares students for higher level study where self-directed learning is critical. It will certainly be a factor in many other qualifications at Level 3 and below. Instead, we support Total Qualification Time as a measure, already employed by Ofqual for the regulation of some of its qualifications. This measure is also similar to the way in which credit hours are calculated for higher education qualifications.

Progression - Measuring progression to employment may be inappropriate for some learners. Adults who are already working alongside their studies won't 'progress' to employment, and instead meet that criterion before they've even enrolled. This could give the misleading impression that a qualification has somehow failed to facilitate entry to employment.

Synoptic assessment - we particularly welcome this feature, especially for programmes that facilitate entry to higher study. The emphasis on behaviours rather than just knowledge, offers a far richer picture of a learner's abilities and aptitude and will be of benefit for anyone considering applications to employment or further learning. For Access to HE, we have had requests from universities and other HE providers for assessment of the qualification to take account of professional behaviours. QAA is currently consulting on a new regulatory framework, and we are seeking feedback on how to embed assessment of professional behaviours in the Access to HE Diploma framework as part of that consultation. We would be very happy to share this feedback in due course.

Declared purpose - This is an important measure and aligns closely with Ofqual's framework. All qualifications should have a stated purpose and demonstrate that they meet that purpose. This is especially important for qualifications that attract public funding.

In our judgement, the Access to HE Diploma specification would also meet each of these quality features, with the possible exception of employer engagement. However, AVAs and further education colleges engage with the higher education providers that recruit from students with Access to HE Diplomas when developing programmes. Universities routinely engage with employers and professional bodies to ensure that their programmes meet required professional standards and the needs of the economy, and are well placed to advise on professional requirements for Access to HE programmes.

Are there certain quality features, such as size (that is, number of guided learning hours) or assessment processes that should be given particular priority? Please give reasons for your answer and if yes, please state which features should be a priority.

No response

Are there particular quality principles that we should consider for adults? Please give reasons for your answer.

Consistent and reliable support for learners. In the academic year 2017-18, 24% of higher education entrants declared a mental health condition, 37% declared a specific learning difficulty, and 9% declared a long term illness or health condition (www.accesstohe.ac.uk/AboutUs/Publications/Documents/Access-to-HE-Data-Report-19.pdf). A similar picture is likely across qualifications at other levels. Indeed, some qualifications will be particularly suitable for learners with specific support needs. There are many students with particular and specific needs for support, and we would welcome the inclusion of how this support is offered as a quality principle.

In addition, many returning adult learners discover that they have some form of dyslexia, dyspraxia or other condition, which contributed to a lower level of achievement through their traditional schooling experience. For learners who have been diagnosed with a neurological condition or who have learning disorder, the consistency of support required is crucial to achieving successful outcomes and high rates of continuation.

Quality principles in different environments. Access to HE, as well as other qualifications, is offered at a number of prisons. This offers a vital opportunity for learners to make fundamental life changes, and plan for life after release from custody. The quality measures must take into account the specific context of delivering qualifications in such an environment. While the Access to HE Diploma operates on a nine-month cycle, our regulation of the qualification allows flexibility with this timeline, as learners in prison may have their programme delayed due to circumstances outside their control.

We would recommend aligning the quality principles with Ofsted's Education Inspection Framework, which has an emphasis on intent and purpose of the curriculum. Alignment also helps promote consistency and comparability across qualification types, which will support current and prospective learners.

At Level 3, what purposes should qualifications other than T Levels or A Levels serve (p24):

a) for 16 to 19 year olds? Please give reasons for your answer.

b) for adults? Please give reasons for your answer.

Our response focuses on (b) only. Qualifications that are aimed at adult learners, such as the Access to HE Diploma, should offer:

- An alternative route to higher study/apprenticeships that includes specific study skills elements to help adult returners. It is worth noting that the Scottish Credit and Qualifications Framework (SCQF) provides a good example demonstrating how different paths (academic, vocational and technical) can lead to qualifications.
- Flexibility, with the qualification designed in partnership with the stakeholders who will benefit from it, such as universities and colleges that offer higher level study, and employers.
- A route to second chances, and new careers and opportunities.
- A plug for national and local skills gaps.

How should we determine “overlap” in relation to (p24):

a) overlaps with T Levels? Please give reasons for your answer.

b) overlaps with A Levels? Please give reasons for your answer.

No response

How could post-16 qualification reform and broader study best support more people to progress directly to level 3 after key stage 4?

No response

How could post-16 qualification reform and broader study best support more people to achieve at level 3?

No response

If level 2 qualifications are intended to lead directly to employment, what quality principles should apply? Please give reasons for your answer including any examples of good practice.

No response

What are the key roles that qualifications at level 1 and below need to play?

No response

Are there additional principles we should apply to level 1 and below? Please give reasons for your answer, indicating clearly where it refers to the qualifications themselves or broader study.

No response

Are there any additional equality impacts of withdrawing approval for funding for pre-existing qualifications that are not included in the equality impact assessment published alongside this consultation? Please give reasons and any supporting evidence for your answer.

No response

Do you agree with the proposed criteria for identifying qualifications with no enrolments? Please give reasons for your answer.

There is a risk that qualifications that move to a full cost recovery model and do not draw down public funding for a period 'drop off' the system, and, therefore, become ineligible for funding in future. There should be a way of recording that qualifications are still operating but are not currently in receipt of public funds.

Are there specific reasons that a qualification with no enrolments should remain approved for funding? Please give reasons for your answer.

See answer to the previous question.

Do you agree we should consider removing approval for funding from qualifications with low enrolments?

Please give reasons for your answer.

It is reasonable for low enrolments to be investigated. However, we would caution against using this as a crude measure of whether funding should be removed without consideration of other quality features. The emphasis on purpose and intent, both in the quality features that are the subject of this consultation, and in Ofqual's criteria, should be a key deciding factor.

A qualification that has a well defined purpose and intent, and that purpose and intent is met, should still be eligible for funding.

We would also like to reiterate our response to the questions about quality features, where we caution against proven track record as a quality feature.

****proposed criteria for identifying qualification with low enrolments pasted below*

Are there specific reasons that a qualification with low enrolments should remain approved for funding? Please give reasons for your answer.

See answer to previous question

Do you have any comments regarding the potential impact the principles and other features outlined in this consultation may have on students from disadvantaged backgrounds, those with SEND or others with a protected characteristic under the Equality Act 2010? Please give reasons for your answer.

No response

Are there any additional impacts that you think should be included in the general impact assessment in our second stage consultation? Please give details of any additional impacts

No response