

Government consultation: Review of post-16 qualifications at level 2 and below

University and College Union response – April 2022

1. The University and College Union (UCU) represents over 120,000 university, further and adult education lecturers, together with related staff. UCU welcomes the opportunity to contribute to the Lifelong Loan entitlement (LLE) consultation.
2. UCU has two main concerns with the consultation.
 - i. We are opposed to limiting choices for learners at level 2 and below, particularly where that reduction may foreseeably reduce opportunities for learners with learning disabilities and for ethnic minority learners to progress to higher learning and to contribute to the economy.
 - ii. We are concerned about the impact on providers/staff, specifically that they will need to spend time understanding the changes to the landscape, selecting new qualifications and learning the new curriculum content, which will be an additional burden for providers and their staff, yet without commensurate additional funding support to make those adjustments.
3. The consultation document outlines the proposals for the future landscape of qualifications for both 16-19 year olds and adults at level 2. The current landscape at level 2 and below is said to be complex, with a high volume of qualifications on offer. The consultation wishes to 'streamline' qualifications with the aim of simplifying the system so that it is easier for employers, students, providers and awarding organisations to navigate. The proposals divide qualifications into groups according to their primary purposes i.e. whether they support progression to level 3 study, whether they support progression to employment, or whether they deliver English skills for speakers of other languages (ESOL). This is in line with the approach taken at level 3. On the technical side, students of all ages will have access to a range of qualifications enabling entry into occupations at level 2, progression onto further technical study at level 3, specialist technical qualifications or qualifications supporting cross-sectoral skills.
4. The driving force behind the review, as with the level 3 consultation, is the employer-centric and narrow view of the purpose of education held by the Department for Education. UCU believes in keeping educational opportunities open,

not closing them down, and whilst the consultation says it wishes to 'streamline' qualifications (e.g. p.3 of the consultation document), the reality is that the proposal in itself introduces complexities. Adults studying at level 2 and below are more likely to have learning disability needs and are more likely to be from minority backgrounds therefore, restricting opportunities at these levels could have profound equalities implications. We are concerned that by removing some of these qualifications from public funding, learners could find themselves being offered alternative learning programmes that would not meet their needs and instead, they would be shut out of learning.

5. The consultation document foresees that many qualifications, particularly the shortest courses and qualifications, will not fit into the proposed qualifications landscape. The consultation document says that these smaller qualifications are unlikely to be able to provide a student with the knowledge, skills and behaviours contained in a relevant employer-led standard, or to provide them with broad content relevant to an occupational route. However, this belief is misguided: for some learners at this level, the smallest qualifications can be a stepping-stone onto other qualifications. Therefore to exclude these qualifications because they are not directly relevant to an employer-led standard, or because they do not directly provide them with broad content relevant to an occupation route, is short-sighted. These qualifications provide an incremental pathway to the longer and higher courses that prepare people for the skills that the economy requires.
6. The consultation proposes a 34% reduction of the qualifications currently available for 16-19 year-olds at level 2. At level 1 and below, there is less of a reduction in qualifications albeit in the consultation document's own words, the reduction is 'still significant'. The consultation's impact assessment foresees that this is likely to have a significant, and potentially costly, impact on providers. In the short term, the consultation expects a significant cost impact on providers as they consider which new options to offer learners. Providers will need to spend staff time understanding the changes to the landscape, selecting new qualifications and learning the new curriculum content. Given the scale of the reduction in available qualifications, this could lead to significant changes for many providers, which is made more likely by the similar impact of the proposed reforms at level 3.
7. The impact assessment identifies some of the impact of the change on providers, including a reference to staff. However, the potential mitigation it puts forward for this impact is to adopt a phased approach to the defunding and reform, as is being done at level 3, which would allow providers to spread the cost over time. The change will add to the staff workload, especially during the transition period. FE lecturers are already severely overworked and underpaid and for this change to have a smooth transition for all stakeholders, there needs to be a more comprehensive impact assessment in relation to providers and their staff, and, in

the interest of staff, providers and learners alike, for the impact of the change to be adequately funded.

8. The changes may result in a reduction in enrolment numbers for some providers where the defunding means providers are no longer able to offer qualifications that some students wish to study. This could result in a reduction in income for some providers. The impact assessment has foreseen some of the negative impacts on staff, albeit indirectly via the providers; however it has not given proper consideration to the impact that the reduction in qualifications may have on staff.

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