

## consultation response

### Department for Education - Government proposals to reform vocational qualifications for 16-19 year olds

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#### Introduction

UCAS is the UK's provider of admissions services for higher education (HE). Our mission is to help applicants to HE make the right choices for the right reasons with the right outcomes, and to benefit our members through the provision of shared services.

UCAS provides information and advice, course information, entry requirements, and admissions services to around 650,000 applicants to over 350 UK higher HE providers each year. These applicants make over 2 million applications to higher education courses. UCAS services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS Progress<sup>1</sup> offers course search and application services focused on the transition to post-16 education and training. Its online course directory and application services cover a range of opportunities and destinations available locally for young people – including academic, vocational and apprenticeships/work-based training. UCAS Progress currently operates across 77 local authorities in England and Wales. Services are used by around 2,180 schools and colleges and available to over 245,000 learners (and their parents).

Our role gives us a unique insight into how qualifications facilitate progression and admission to HE.

#### General observations and comments

Whilst A levels remain the predominant qualification used by UK learners to support progression to HE, vocational qualifications are increasingly being used for the same purpose. BTECs are now the second most widely used qualification for entry to HE.

Attached at Annex A are excerpts from the UCAS 2012 End of Cycle report and other analysis which demonstrates how vocational qualifications such as BTECs are increasingly being used by students to support progression. For example, between 2008 and 2012 the entry rate for 18 year old UK domiciled applicants holding BTECs has increased 2 percentage points (81% proportionally). About a half of this increase has come from applicants holding BTECs in combination with A levels<sup>2</sup> (figure 1) although the entry rate for UK18 year olds holding BTECs remains higher than those holding BTECs in combination with A levels (figure 2).

As the data on entry rates by qualifications and background show, students use their qualifications to pursue different progression routes. In 2012 there were an estimated 200,000 BTEC learners and approximately half of these students applied for HE through UCAS. This compares to approximately 75% of UK domiciled students studying A levels who apply to HE. Of these, the entry rate to HE for UK domiciled 18 year olds holding BTECs is 4.7% compared to 23.0% of the same age cohort holding A levels (Annex A, figure 1).

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<sup>1</sup> <https://www.ucasprogress.com/>

<sup>2</sup> UCAS. December 2012. End of Cycle Report 2012. Page 52.

Applicants holding BTECs are more likely to be from areas of low participation in HE (Polar2 quintiles 1 and 2<sup>3</sup>) than applicants holding A levels and are more likely to apply from a further education or sixth form college than from a state, grammar or independent school. Whilst entry rates for UK 18 year olds holding A levels are highly differentiated by background (figure 8) the entry rates for the same cohort holding BTECs are largely undifferentiated by background<sup>4</sup> (figure 7).

Although 18 year old UK applicants holding BTECs are less likely to be accepted into HE (figure 9), entry rates to all institutions are increasing for 18 year old UK students holding BTECs. However, there remains a significant difference between entry rates to high Tariff institutions (0.3%) compared to low Tariff institutions (3.2%) (figures 4-6).

In conjunction with the evidence in the Government's Social Mobility strategy<sup>5</sup> this analysis demonstrates the importance of vocational qualifications to widening participation. Proposals for the reform of vocational qualifications for 16-19 year olds therefore need to take account of the widening participation agenda.

In addition, the data presented in the consultation document suggest that the proportion of students taking purely academic qualifications has declined from 70% in 2008 to 51% in 2012. This trend may continue if students increasingly opt to study vocational qualifications, or a mixture of academic and vocational qualifications, following the introduction of revised A levels that are designed to be more demanding, and the de-coupling of AS and A levels.

If this trend continues any increase in participation in HE (and sustaining and increasing widening participation) will have to be supported by increased progression using vocational qualifications. HE is therefore likely to be interested in the impacts of these reforms and any others which touch on the assessment, content and structure of vocational qualifications. As indicated above and in Figures 4-6 of Annex A, there is evidence that BTECs (and potentially other VQs) are less successful in supporting progression to more selective HE providers. If VQs are to support progression to a wider range of HE courses, Awarding Organisations will need to engage with a range of HE providers in order to match the curriculum and assessment more closely to the requirements of HE i.e. in the same way that they are required to engage for A levels.

On a separate issue, it is as yet unclear what impact, if any, the government's policies on high grades and student number controls might have on qualification choices or applications to HE. At present only a limited number of vocational qualifications are included in the exemption list, and currently combinations of qualifications (such as A levels and BTECs) are not considered for exemption.

We also note that although the proposals in the consultation relate only to England, the reform of vocational qualifications will have an impact across the UK, as students holding these qualifications apply to HE providers in Scotland, Wales and NI, and these providers assess the suitability of these vocational qualifications for progression to their courses. Consistency in standards is important across all of the UK nations to ensure that individuals

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<sup>3</sup> Developed by HEFCE and classifies small areas across the UK into five groups according to their level of young participation in HE. Each of these groups represents around 20 per cent of young people and are ranked from quintile 1 (areas with the lowest young participation rates, considered as the most disadvantaged) to quintile 5 (highest young participation rates, considered most advantaged).

<sup>4</sup> UCAS. December 2012. End of Cycle Report 2012. Page 56.

<sup>5</sup> HM Government. April 2011. Opening Doors, Breaking Barriers: A Strategy for Social Mobility. Page 44

have similar opportunities to study and work anywhere in the UK and hold qualifications which are internationally recognised and understood.

## **Section 2: How should we describe and categorise post-16 qualifications?**

### **Question 1: Do the three categories of qualifications reflect the diversity of qualifications and study aims for the 16-19 cohort?**

It is important that there is clarity about the types of vocational qualifications available and how they support progression to HE, and also to apprenticeships, employment, and other study. The consultation proposes the classification of qualifications into two categories; Applied General Qualifications and Occupational Qualifications and recognises that both categories support progression to HE. In broad terms, the proposed categories reflect the diversity of qualifications and study aims for the 16-19 cohort.

The Social Mobility strategy stresses that the Government is committed to “reducing the gap between vocational and academic routes<sup>6</sup>” to ensure that both routes allow young people to progress. The strategy also reiterates the Government’s belief that the “vocational system must be a credible and respected route to success<sup>7</sup>”. Ensuring that the qualifications all young people study are of high quality and valued by a range of stakeholders is important to achieving this. However, it is also important that the classification of qualifications avoids creating or implying an unintended hierarchy of value which could inappropriately influence or guide learner choice.

We note that the paper states that Applied General Qualifications “are often taken alongside A levels, where they may satisfy an entry requirement for HE institutions.” This could be taken to imply that such qualifications when taken on their own are not suitable for progression to HE. Our analysis shows that this is not the case, at least for BTECs. Figure 2 at Annex A shows that the entry rate to HE for UK 18 year olds taking BTECs was 2.9% in 2012, compared to 1.8% for those taking BTECs in combination with A levels. Although this is likely to be a reflection of the relative numbers taking BTECs versus combinations, this does demonstrate the suitability of some vocational qualifications for progression to HE in their own right.

## **Section 3: How should we define high value vocational qualifications?**

### ***Proposed characteristics for Applied General Qualifications***

### **Question 6: Do you agree with these standards for Applied General Qualifications?**

Any selection and classification of vocational qualifications needs to be transparent and based on clear criteria so that learners, schools, advisers and HE providers are clear why certain qualifications are treated in certain ways. Whilst it is welcome that the text of the consultation recognises how Applied General and Occupational Qualifications enable progression to HE it is of concern that the flow diagram describing how the selection of qualifications for inclusion in league tables could work does not mention HE. We would expect to see some requirement to demonstrate progression to HE to be included.

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<sup>6</sup> HM Government. April 2011. Opening Doors, Breaking Barriers: A Strategy for Social Mobility. Page 43.

<sup>7</sup> HM Government. April 2011. Opening Doors, Breaking Barriers: A Strategy for Social Mobility. Page 37.

The consultation document describes a number of characteristics that Applied General Qualifications and Occupational Qualifications should fulfil in order to be considered for inclusion into the performance tables.

Size is a characteristic that is listed for both Applied General Qualifications and Occupational Qualifications. Although UCAS does not feel it appropriate to comment on the actual size specified, we note that there are concerns in the HE sector about the use of guided learning hours as a measure of size. We are aware that Ofqual intends to consult on alternative qualification size measures later this year and assume that this would be reflected in these proposals.

External assessment, synoptic assessment and grading may not always be appropriate or the most appropriate means of assessing all vocational learning, especially where the candidate is required to display a range of vocational and practical skills. There are likely to be a number of well regarded vocational qualifications that offer progression through a number of pathways, including to higher education, that do not currently have the stated characteristics.

### **Question 8: How can we best judge whether a qualification is valued by Higher Education?**

The consultation proposes that awarding organisations should provide evidence that young people who complete the qualifications in question are able to go on to study at a higher level. One of the suggested measures is the proportion of institutions recognising the qualification for entry into HE. There may be some challenges in addressing this.

HE providers are autonomous institutions and different institutions take different views on the suitability and relevance of qualifications for progression to their courses. Whilst vocational qualifications are accepted by some institutions they will not be accepted by others. This is evidenced by the UCAS analysis which shows the different entry rates for 18 year old UK BTEC students to different kinds of institutions (figures 4-6). These differences in approach will be based on a range of considerations which will be carefully applied by each institution to each of its courses. For instance, some institutions may not accept particular vocational qualifications as they may not be suitable for their method of delivery or course portfolio. This does not mean that these qualifications are unsuitable for progression to HE elsewhere.

This makes it difficult to make a single judgement about whether a qualification is valued by HE generally. It is also worth noting that value cannot be easily determined by looking at entry requirements. Given the huge number of UK level 3 qualifications available (not to mention EU and international qualifications) institutions typically publish only the most commonly held qualifications in their entry requirements – even though they may well accept many other qualifications.

We would recommend further engagement with the full breadth of the HE sector to gain a richer insight and understanding of their perceptions of vocational qualifications.

Additionally, evidence suggests that students studying part-time courses are more likely to be entering with vocational qualifications. They also tend to study more vocational orientated courses in higher education<sup>8</sup>. Any assessment of the value of vocational qualifications for HE should specifically consider these learners and their progression routes.

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<sup>8</sup> Department for Business, Innovation and Skills. June 2012. BIS Research Paper Number 68 - Expanding and Improving Part-time Higher Education.

UCAS would be happy to discuss with the Department how our analytical work might inform the understanding about which qualifications support progression.

We also recommend that work is needed to map and describe common progression pathways from substantial vocational qualifications – encompassing progression pathways to further learning and training, higher education and employment. For example, research published by Pearson on BTEC progression shows that BTEC learners typically enter HE later than those taking A levels and via less linear routes. As well as providing evidence to better understand how vocational qualifications are valued by HE, this approach will also help to explain the range of choices and options to young people selecting vocational qualifications and making informed choices.

### ***Proposed characteristics for Occupational Qualifications***

#### **Question 9: Do you agree with these standards for Occupational Qualifications? Can they be applied across any sector or area?**

We believe that the same points raised above regarding qualification size, synoptic assessment, and progression to HE also apply to Occupational Qualifications.

#### **Section 5: Timing**

There is a significant amount of reform being undertaken in relation to qualifications throughout the UK, encompassing not just A levels, GCSEs and Apprenticeships, but also fundamental reforms in Scotland and Wales. Northern Ireland is also reviewing its secondary qualifications.

The Chief Regulator of Ofqual recently noted in her response to the Department for Education in relation to A level reform that the “introduction of new GCSEs and A levels at the same time will place a considerable burden on schools<sup>9</sup>.” Reform to vocational qualifications will also add to the considerable workload schools will need to undertake over broadly the same period of time.

Whilst it would seem sensible for there to be a transition period to enable the redevelopment of some vocational qualifications, this will inevitably place an additional burden on schools, colleges and the HE sector. If there is significant change HE providers may need to review and revise their entry requirements.

We are aware from our Qualifications Information Review that HE providers are looking for more information about vocational qualifications. Our review also identified that schools and colleges felt that some HE providers lack understanding about vocational qualifications. With these reforms there will be an even greater need for high quality and impartial information, advice and guidance to help students make sensible vocational qualification choices and to help HE providers understand the content, structure, and assessment of vocational qualifications. UCAS communications activities reach of tens of thousands of young people, applicants, parents, teachers and advisers as well as admissions professionals in UK universities and colleges and we would be willing to support efforts to communicate these changes in a joined up way across the HE sector.

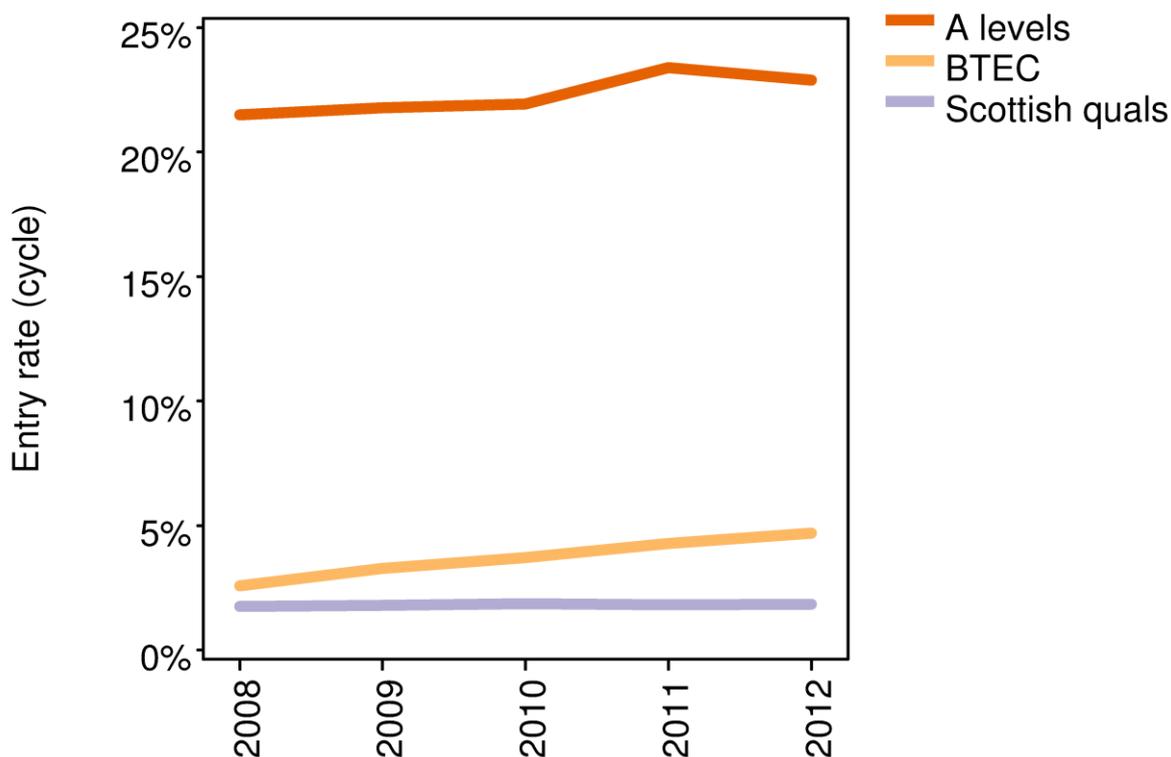
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<sup>9</sup> <http://www.ofqual.gov.uk/files/2013-03-22-letter-to-secretary-of-state-for-education-alevel-reform.pdf>

## Annex A: Supporting evidence from the 2012 admissions cycle.

In December UCAS released its End of Cycle report for 2012<sup>10</sup>. The report provides a detailed statistical analysis of the 2012 admissions cycle and explores applicant and institutional behaviour. In particular, the report contains analysis of the behaviour of applicants holding particular qualification types, such as A levels and BTECs. Below are relevant extras from this report together with some supplementary analysis about progression with BTECs.

**Figure 1: Entry rate by qualifications held**  
UK 18 year old entry rate split by qualifications held



Source: Figure 35 from UCAS 'End of cycle report 2012', [www.ucas.com](http://www.ucas.com)

Figure 1 shows the entry rate (acceptances to HE divided by the base population estimate) for UK 18 year olds split by the type of qualification held by the accepted applicants. These groups are not mutually exclusive i.e. those holding A levels may also hold BTECs and vice versa.

This shows that A levels are the mostly held qualification for this group; 23% of UK 18 year olds were accepted for entry in 2012 holding A levels. The second most widely held qualification is BTECs. 4.7% of UK 18 year olds were accepted for entry in 2012 holding BTECs. This entry rate has increased 2 percentage points (81% proportionally) since the 2008 cycle. Around half of this increase has been for applicants who hold BTEC qualifications in combination with A levels.

<sup>10</sup> The full report can be found here:

[http://www.ucas.ac.uk/documents/End\\_of\\_Cycle\\_Report\\_12\\_12\\_2012.pdf](http://www.ucas.ac.uk/documents/End_of_Cycle_Report_12_12_2012.pdf)

Figure 2: Entry rate by qualifications held – mutually exclusive groups

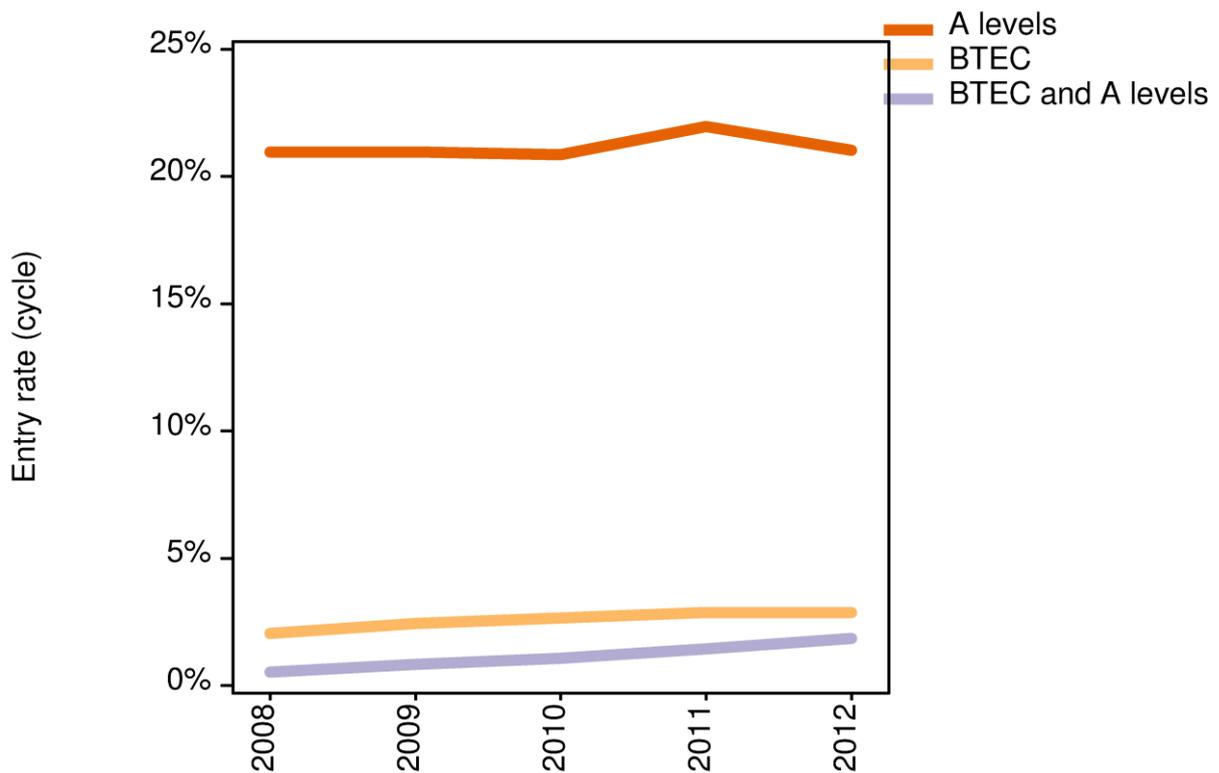
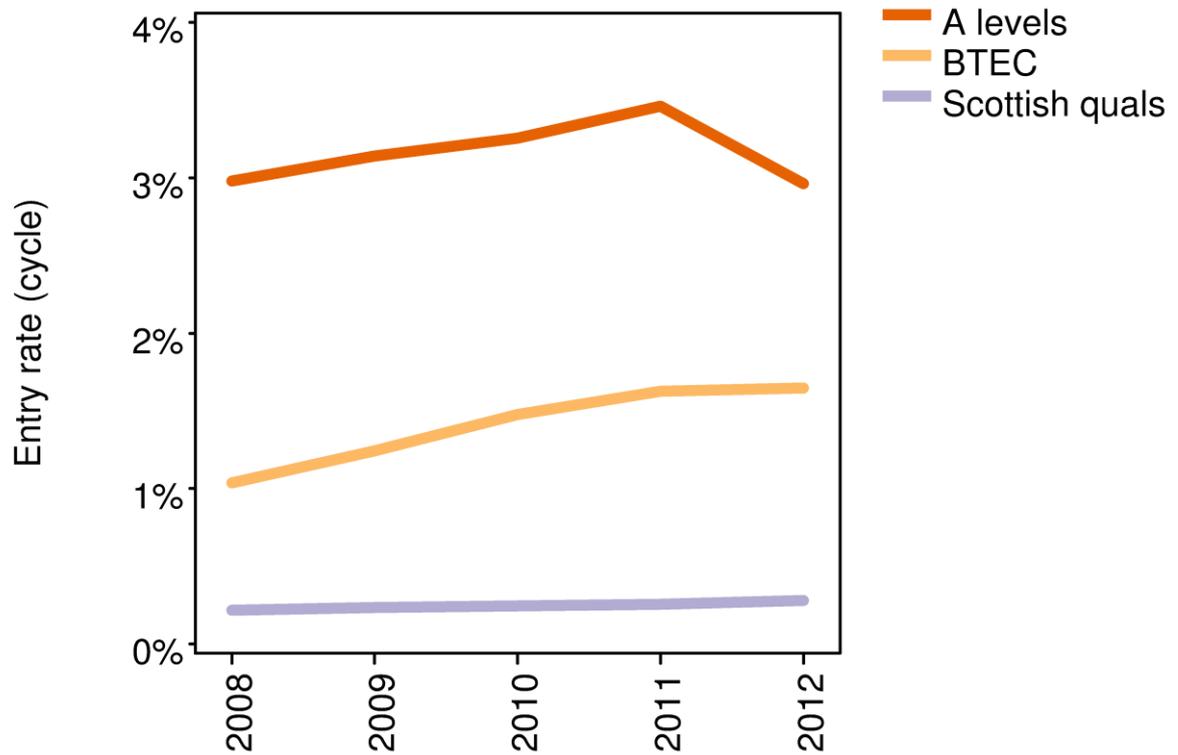


Figure 2 presents the same data on the entry rates of UK 18 year old applicants, but with a mutually exclusive split of the qualifications held i.e. those shown as holding A levels excludes any entrants holding A levels plus BTECs, although this could include A levels with other qualification combinations. This shows that the entry rate for those holding BTECs alone (or in combination with other non-A level qualifications) exceeds the entry rate for those holding BTECs in combination with A levels. It also shows that the entry rates of both groups are growing (whilst the A level entry rate is declining) and that the BTEC + A level entry rate is growing the fastest of all three. This is likely to be driven by increasing numbers of students taking A level and BTEC combinations.

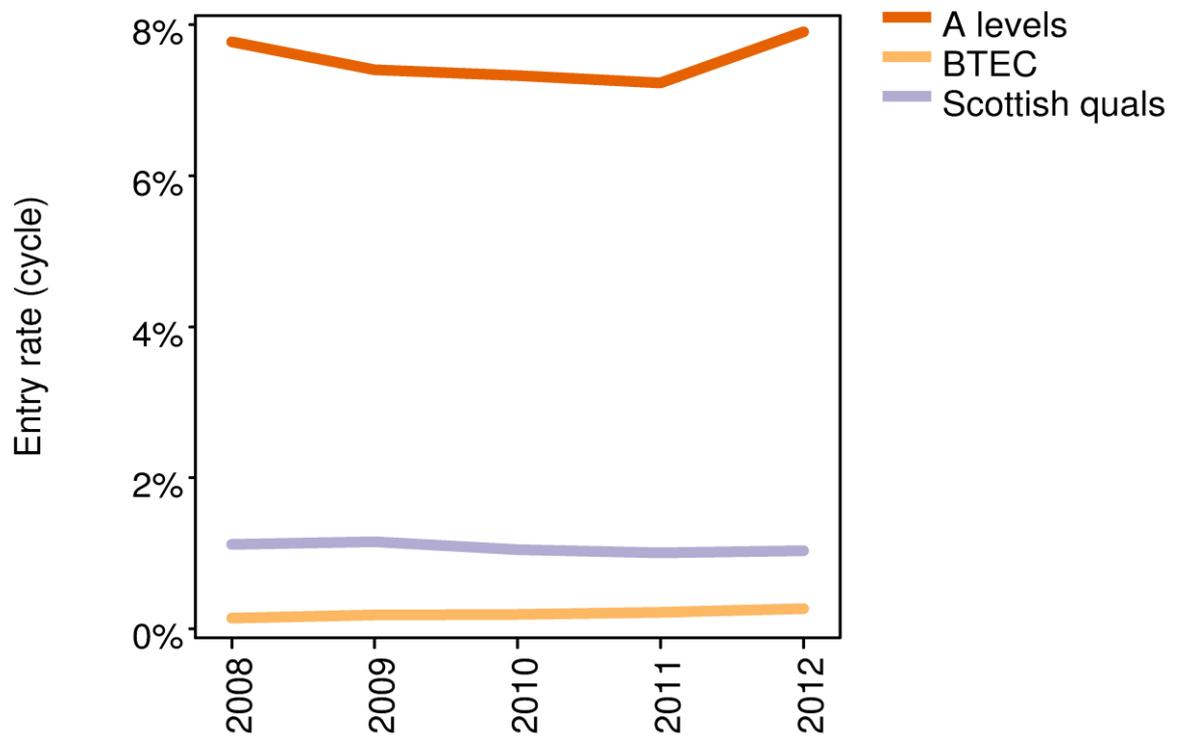
**Figure 3**  
UK domiciled 19 to 21 year old entry rate split by qualifications held



Source: Figure 37 from UCAS 'End of cycle report 2012', [www.ucas.com](http://www.ucas.com)

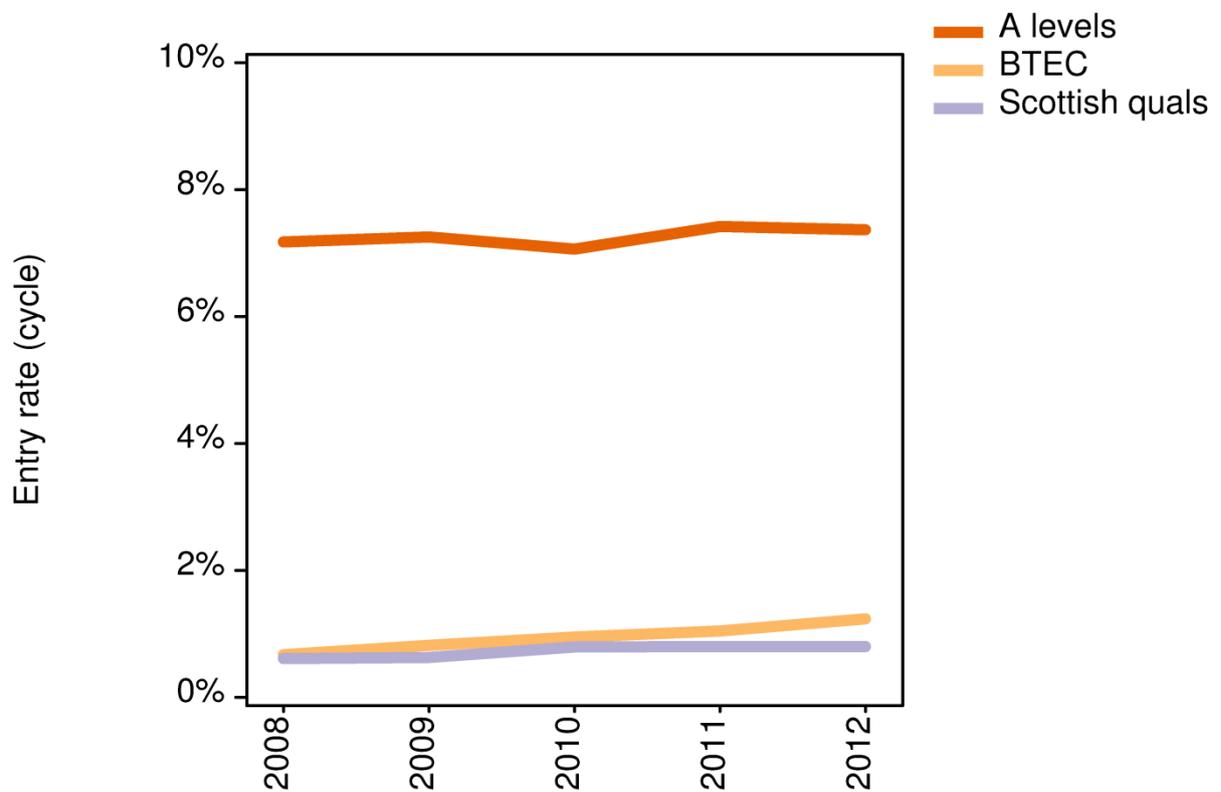
Figure 3 shows the entry rate for 19 to 21 year olds split by the qualifications held by accepted applicants. 3% of the population in this age group entered HE holding A levels representing a fall of half a percentage point from the previous cycle. Accepted applicants holding BTECs represented 1.6% of the 19 to 21 year old population. This is around half of that of those accepted holding A levels.

**Figure 4: Progression of applicants to high Tariff institutions**  
 UK 18 year old entry rate to higher tariff institutions split by qualifications held

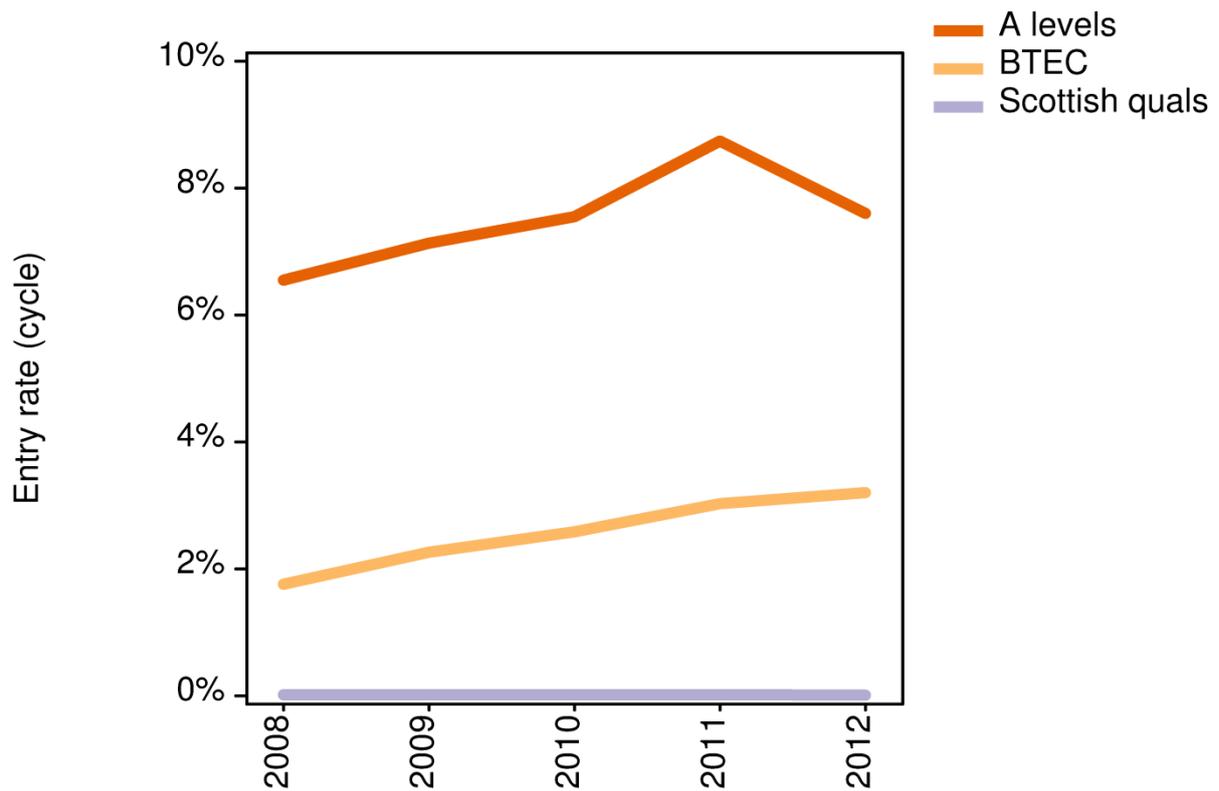


Source: Figure 36 from UCAS 'End of cycle report 2012', www.ucas.com

**Figure 5: Progression of applicants to medium Tariff institutions**



**Figure 6: Progression of applicants to low Tariff institutions**

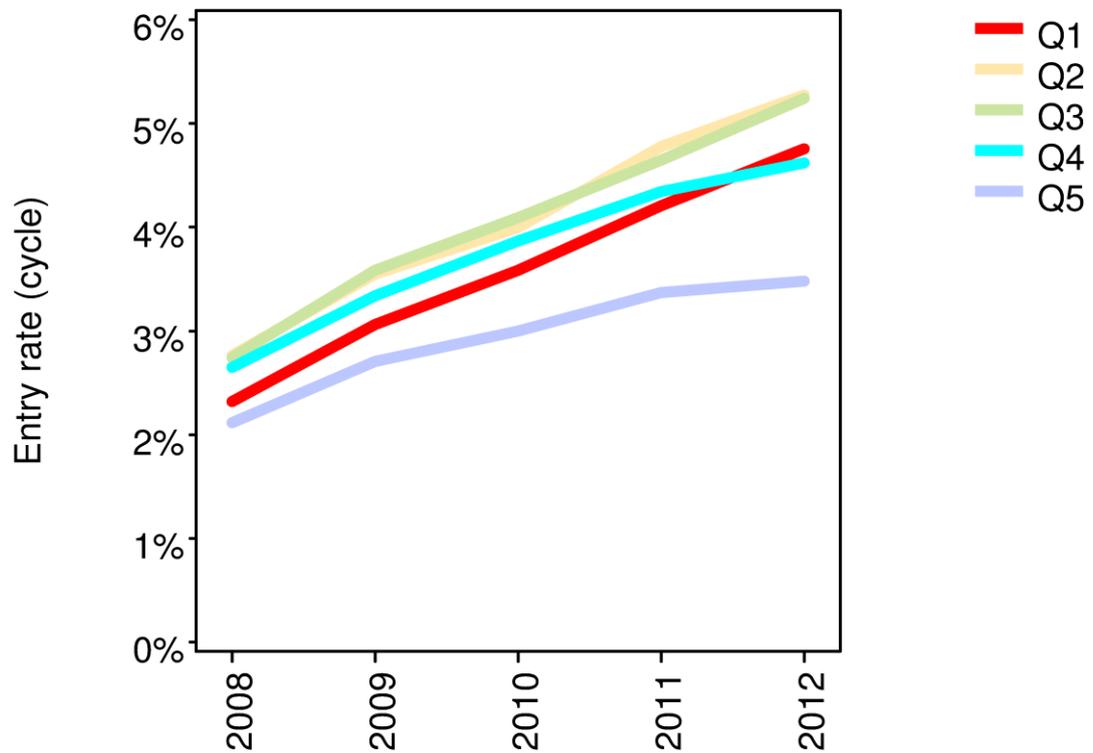


Figures 4-6 show the entry rates of UK 18 year old applicants holding different qualifications to type of HE institution by high, medium, and low Tariff (as defined by the average levels of attainment of their accepted applicants, measured in UCAS Tariff points).

This shows that 0.3% of UK 18 year olds were accepted into high Tariff institutions in 2012 holding BTECs. This is a large proportional increase from 0.1% in 2008. For medium Tariff institutions the entry rate for BTEC students was 1.2% (compared to 0.7% in 2008) and for low Tariff institutions, it was 3.2% (compared to 1.8% in 2008). This demonstrates that BTECs are most likely to be accepted as suitable for progression to lower Tariff institutions and least likely to be accepted as suitable at high Tariff institutions.

**Figure 7: Entry rates by POLAR2 (BTEC applicants)**

UK 18 year old entry rates by POLAR2 group (accepted applicants holding BTECs) (POLAR2 – quintile 5 (Q5)=highest participation areas)



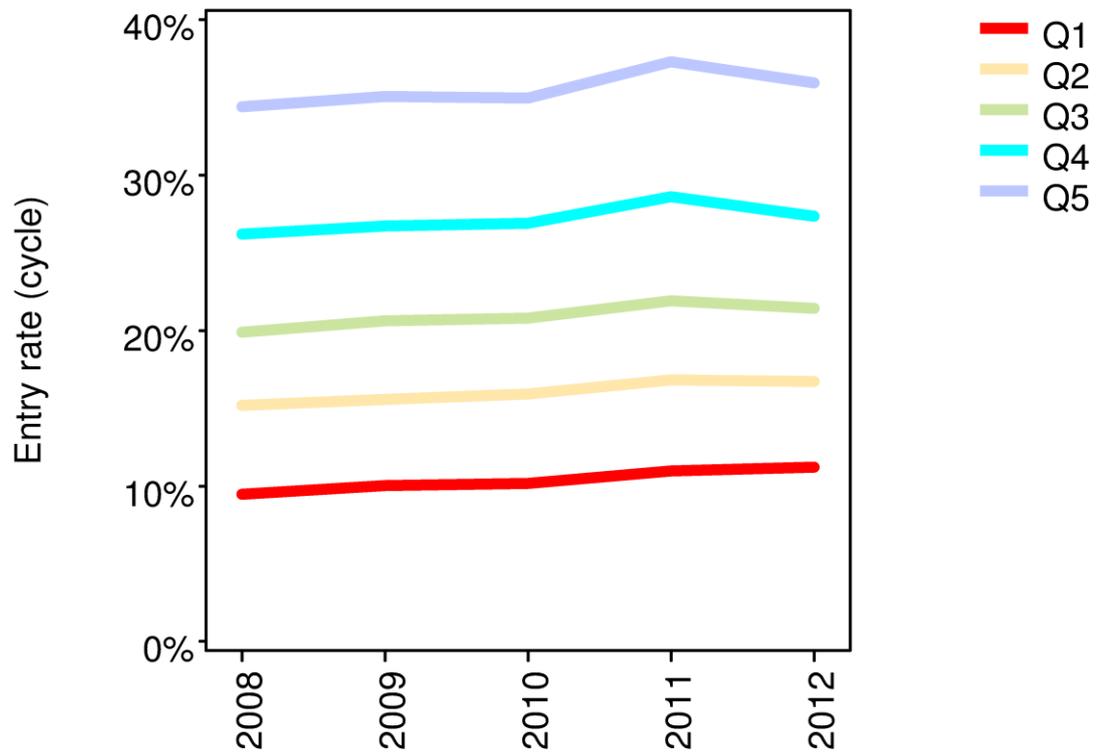
Source: Figure 39 from UCAS 'End of cycle report 2012', [www.ucas.com](http://www.ucas.com)

As Figure 1 shows, the entry rate for applicants holding BTEC qualifications has substantially increased since 2008. Figure 7 looks at the entry rate of UK 18 year olds holding BTEC qualifications by background using the POLAR2 classification.

This shows relatively little differentiation in the entry rate of BTEC students by background. Approximately 5% of the 18 year old population in each background group were accepted for entry in 2012, with the exception of the most advantaged areas (Quintile 5) where 3.5% of the population were accepted holding BTEC qualifications.

**Figure 8: Entry rates by POLAR2 (A level applicants)**

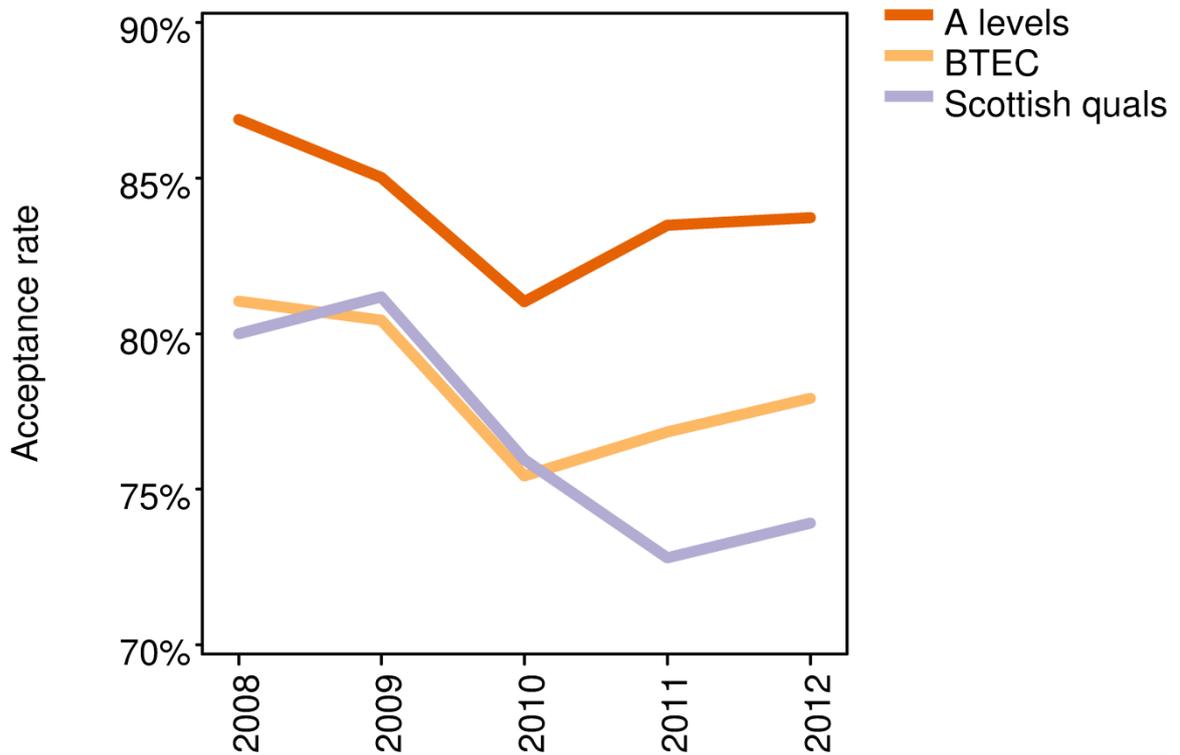
UK 18 year old entry rates by POLAR2 group (accepted applicants holding A levels) (POLAR2 – quintile 5 (Q5)=highest participation areas)



Source: Figure 38 from UCAS 'End of cycle report 2012', www.ucas.com

Figure 9 shows the proportions of the UK 18 year old population in each POLAR2 area who are accepted to HE and hold A levels. There is a marked differentiation in these entry rates across the groups, with young people in more advantaged areas being substantially more likely to enter HE and hold A levels than those living in more disadvantaged areas.

**Figure 9**  
Acceptance rates for UK 18 year olds by type of qualification held



Source: Figure 40 from UCAS 'End of cycle report 2012', [www.ucas.com](http://www.ucas.com)

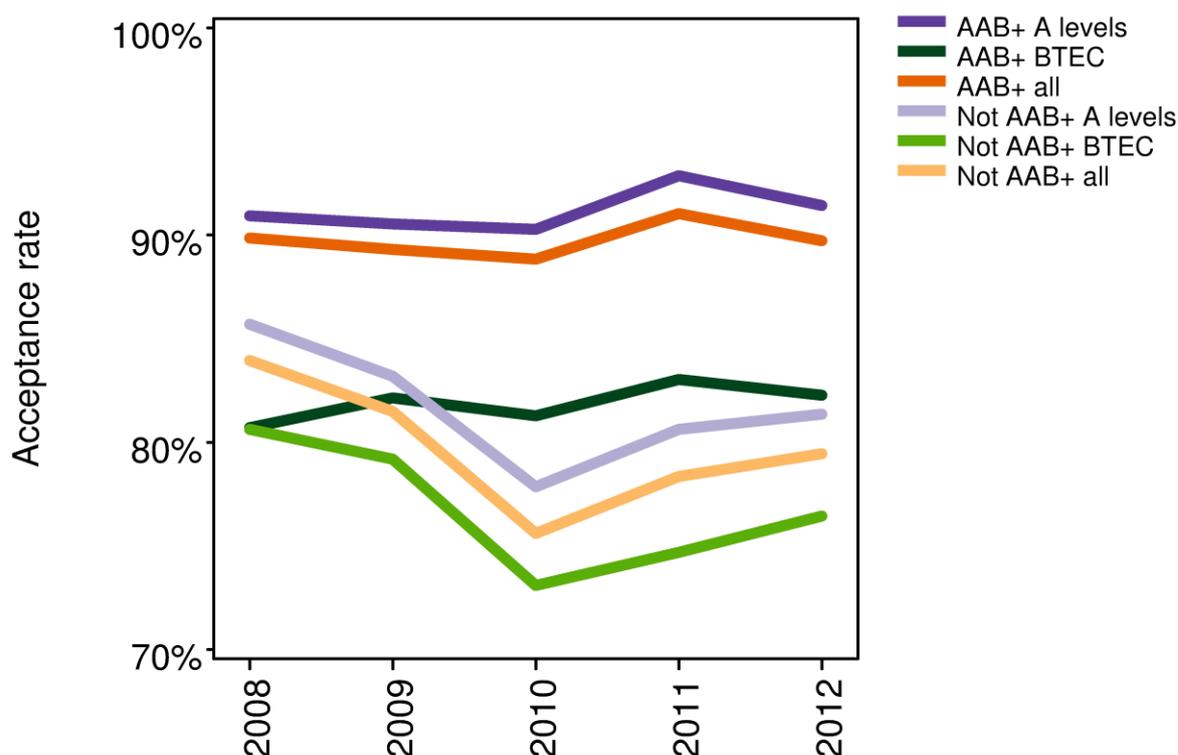
Figure 9 shows the acceptance rate of the UK 18 year olds by qualification type. (Acceptance rate is the number of acceptances divided by the number of applicants i.e. how many of each cohort who applied were actually accepted).

The acceptance rate for BTEC applicants has increased by 1.4 percentage points in 2011 and by 1.1 percentage point in 2012. In comparison, the acceptance rate for applicants holding A levels has increased by 2.5 percentage points in 2011 and 0.3 percentage points in 2012.

The acceptance rate in 2012 was lower than in 2008 and 2009 for each qualification type listed. For all applicants, the acceptance rate in 2012 was 71.1%, compared to 70.2% in 2011.

**Figure 10: Acceptances rates by type of qualifications held in relation to student number controls**

Acceptance rates for English 18 year olds by type of qualification held



Source: Figure 41 from UCAS 'End of cycle report 2012', www.ucas.com

One of the changes to HE in 2012 was the introduction of qualification related criteria for student number controls at English institutions. Specifically, for most courses at HEFCE-funded institutions, entrants into the 2012-13 academic year whose qualifications were listed in a set of high grade combinations, were exempt from number control limits. Entrants to all other courses were subject to number control limits. As shorthand, the high grade qualification combinations that were exempt from the number control arrangements for 2012-13 are referred to as 'AAB+' in this report, reflecting the threshold for the A level exempted grades.

Figure 10 shows that the acceptance rate for English 18 year olds holding 'AAB+' has varied between 88.8% and 91.0% over the past five cycles. The acceptance rate for applicants holding 'AAB+' from A levels has varied between 90.3% and 92.9% over this period and has remained around 9 percentage points higher than the acceptance rate of those holding 'AAB+' from BTECs (which has ranged from 80.7% to 83.0% over the period).

The acceptance rate for both those holding 'AAB+' from A levels and those holding BTECs fell in 2012 by 1.4 percentage points and 0.8 percentage points respectively (A levels to 91.4%, to BTECs 82.3%), but in both cases the rates remained higher, or similar to, the acceptance rates observed for applicants with these qualification in the 2008 to 2010 cycles.

In 2008, the acceptance rate for English 18 year olds not holding 'AAB+' was 83.9%, this fell to a low of 75.6% in 2010. The acceptance rate then increased in both the 2011 and 2012 cycles to reach 79.5% in 2012.

Within those not holding 'AAB+', the acceptance rate for those with A levels is around 5 to 8 percentage points higher than those with BTECs. This is a smaller differential between these qualification types than amongst those holding 'AAB+', contributing to the acceptance rate for those not holding 'AAB+', but holding A levels, being similar, and in some cycles higher, than those holding 'AAB+' from BTEC Qualifications.