UCAS response to the review of post-16 qualifications at Level 3 in England: Second Stage

UCAS is an independent charity that connects people to their future pathway, whether this be an undergraduate or postgraduate degree, Level 4/5 study, distance learning, or an apprenticeship. We deliver high quality and personal information and advice digitally, with ucas.com receiving 30 million unique visits a year. We also use our data science capabilities to support students in making aspirational choices, most recently through the introduction of Clearing Plus, which matches students to appropriate opportunities based on their interests and circumstances.

The forthcoming 2021 release in spring of our upcoming student choice report will provide unparalleled insight into student motivations and decision-making, mapping students from GCSE selection, to their choice of undergraduate study and beyond. These findings will cover many of the issues in this consultation and we look forward to sharing key findings with the Department. This will be the first in a series of outputs looking at student choice across the full range of post-secondary destinations, including apprenticeships, higher technical qualifications, and employment.

This response encapsulates UCAS' perspective on qualification progression, including the review of Post-16 qualifications at Level 3, and the separate information gathering exercise at Level 2. In summary, it is UCAS' view that the Department should consider the following when reforming the qualification landscape:

- ***The role of vocational and technical qualifications in levelling up***: Vocational qualifications at Level 3 have made a significant contribution to widening access and participation and the broader levelling up agenda, with BTEC accepted students more than twice as likely to be from UCAS multiple equality measure (MEM) Group 1[1] than their counterparts taking A levels. Any reduction in the range of funded qualifications to students should be mindful of this contribution by ensuring that the reformed vocational and technical offering continues to enhance social mobility across all pathways. In short, routes that currently support social mobility should not lose funding without an alternative route established.

[1] See Annex A for fuller explanation.
https://www.ucas.com/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/equality-and-entry-rates-data-explorers

- ***The impact on student choice***: UCAS welcomes any move that simplifies student choice; however, more must be done to improve student decision making in addition to qualification reform. Students should be fully aware of the multitude of pathways, where they lead, and how this varies by the qualifications they select at both Level 2 and Level 3. For example, a student who seeks to study a particular subject or vocational qualification should be able to understand the higher education (HE) courses that are common progression routes across Levels 4, 5 and 6, suitable apprenticeship standards they could progress to, or common careers. UCAS, as a single location for the full range of post-secondary destinations, would welcome a greater role in the Government's Careers Strategy and as a route to communicating with students.
- ***Awareness within providers of Level 4+ provision*:** Universities, colleges, employers, and training providers must have a full understanding of changes to the availability of qualifications, particularly given the likely scale of change as major qualifications are withdrawn and T levels rolled-out. Given UCAS has a direct relationship with around 400 universities and colleges, including on level 4 /5 provision, we propose being a part of the DfE's engagement strategy with providers.
- ***The importance of transparent and robust regulation*:** We welcome the proposal 'that all qualifications which are approved for funding should be subject to Ofqual regulation' as it seeks to strengthen its scrutiny and regulation of post-16 qualifications. All end-users of post-16 qualifications must have upmost confidence in their quality and suitability for onward progression.
- ***The role of apprenticeships*:** UCAS offers a broad range of qualification information to students, schools, universities, and colleges. A key feature of this is the UCAS Tariff, a broad metric that assesses the size and standard of a qualification. At present, Tariff points are allocated to a wide range of academic and technical qualifications, including T levels. However, Tariff points are not currently allocated to Apprenticeship Standards, meaning only partial coverage across the range of choice available to students. UCAS would be keen to work with the Department and devolved equivalents to explore allocating Tariff points to Level 3 apprenticeships. To achieve this, the following would need to be agreed across the UK:
    - An agreed and comparable measure of size for apprenticeship provision.
    - An agreed standard of apprenticeships at Level 3, and how this relates to other qualifications.
    - An agreed management of variance for differing apprenticeship structures, including grading.

How Level 3 qualifications facilitate progression to higher education and training

The UK HE sector continues to offer progression opportunities from a range of different qualifications – students (domestic, and international) apply with over 750 different qualifications each year. As far as we are aware, this diversity in entry qualifications is unique to the UK HE system. Information about the array of qualifications at Level 3 used by UCAS applicants can be seen below. Employers and training

providers will see many more, including work-based qualifications such as National Vocational Qualifications (NVQs) and competence-based qualifications.

Figure 1: The common qualifications used by 18 year old UK domiciled applicants in the 2020 entry cycle[2]

In our response to the Post-16 Review, it was noted that Applied Generals and Tech Level qualifications in particular play an important and distinct role in supporting students in progressing to HE, and make a notable contribution to widening access and participation. Given that BTEC qualifications are the most common, this analysis focusses on them. However, other Applied General qualifications, such as OCR Cambridge Technicals, City and Guild's qualifications, and CACHE also currently provide important progression opportunities.

As is clear in Figure 1, A levels continue to be the most common qualification held by applicants to HE, representing 62.4% of English 18 year old applicants in 2020. However, by far the most significant secondary group are those holding BTEC qualifications on their own (10.5%) and in conjunction with A levels (8.2%). When undertaking reform to these qualifications, such as introducing a more binary system, ensuring that a cohort of students is not left without a progression route is vital. In addition, consideration should be given to the relatively socio-economically disadvantaged profile of students that undertake these qualifications. Indeed, this group is more diverse and representative of the whole

[2] The size of each section represents the number of applicants holding at least one of each qualification type. Any qualifications held by fewer than 1,000 applicants will be included in the 'other' group. The 'other' group represents 9,980 students who applied with less commonly held qualifications

student population than those studying a purely A Level route. For example, when compared to A level students:

- A greater proportion of BTEC students are from disadvantaged backgrounds: In 2020, of all English accepted applicants with at least one BTEC qualification, 17.1% were from POLAR4 quintile 1, compared to 10.1% of placed applicants holding one or more A level qualifications. When analysing this using the UCAS MEM, of all English 18 year old accepted applicants with at least one BTEC qualification, 12.0% were from MEM quintile 1, compared to 5.5% of placed applicants holding one or more A level qualifications.
- A greater proportion of BTEC students are BAME: In 2020, of all English accepted 18 year old applicants with at least one BTEC qualification, 36.1% were from ethnic minorities compared to 30.6% of placed applicants holding one or more A level qualifications.
- More than a third of students accepted onto teaching, nursing, and computer science courses study BTECs: In 2020, more than 1 in 3 of 18 year old acceptances in England held BTEC qualifications for Education (39%), Subjects Allied to Medicine (including Nursing) (35%) and Computer Science (33%).

The acknowledgement in the consultation that Core Maths, EPQ and other 'small' qualifications that offer additional and complementary skills will be funded is welcome, as these are viewed positively by the HE sector. However, the impact of the ceasing of funding for more generalist Applied General qualifications, such as BTEC Extended Diplomas in addition to Subsidiary Diplomas, typically taken in conjunction with A levels, should not be underestimated with mitigation required to support progression.

How Level 2 qualifications facilitate progression to higher education and training

Level 2 qualifications act as the foundation for progression to Level 4 and above provision. It is UCAS' view that safeguarding breadth of Level 2 study is important, ensuring that students have a wide range of progression opportunities available to them upon completion. Reassuringly, our upcoming research will suggest that GCSE subject choice has limited influence on the progression opportunities available to students, with pathways remaining open.

One notable exception related to HE admissions is where subject-specific Level 2 study is used to evidence core skills. For example, GCSE English and mathematics is commonly used to evidence skills in these areas, as are science subjects on occasion. Other Level 2 qualifications can sometimes satisfy these requirements, such as Functional Skills at Level 2. However, approaches do vary in this area, with some universities and colleges specifying a preference for GCSE. Therefore, it is important that students understand the progression opportunities available to them at this early stage in their secondary education.

The information-gathering document makes reference to a transition programme supporting student progression to T levels or other programmes. This is very welcome. Providing early clarity to ensure students, universities, colleges, employers, and training providers are familiar with the changing pathways, and the cohorts that follow these routes, will be critical if reforms are to be understood and this is something UCAS would be able to help communicate.

It is also worth noting that in many cases the Level 2 requirements in HE are determined by a Professional, Statutory or Regulatory Body (PSRB), e.g. the General Medical Council (Medicine) or the Institution of Civil Engineers (Civil Engineering). Therefore, to ensure students have the full range of opportunities available to them, engagement with these bodies would be necessary to ensure that any qualification reforms satisfy professional requirements.

Student decision-making

Whilst the directive of the consultation is clear – to distinguish between those qualifications designed for employment ('technical qualifications') and those for progression to HE ('academic qualifications'), student decision-making is far from binary, and many do not follow linear progression journeys – it is realistic, and often desirable, for students to change pathway; ensuring they have a clear understanding of qualification content, aims and skills development, along with any necessary bridging provision, is vital. Indeed, there is significant evidence, including from the CBI[3], that employers themselves do not think in binary terms, instead preferring a mix of academic, technical, and experience when recruiting.

UCAS will shortly launch its 'Student Choice' annual report, covering student decision making from Level 2 to first employment, encapsulating the full range of provision available. Early analysis has identified:

- Students sitting Applied General qualifications are more fixed in their HE progression decisions than those sitting A levels, with a greater proportion sure of what they wanted to study at degree level before picking their Level 3 options.
- GCSE subject choice does not significantly impact a student's options at Level 3 or beyond, with GCSE attainment acting as a larger limiting factor.
- Around 2 in 5 students report they would have made better decisions if they have had more information and advice at the point of making their degree, post-16 and/or GCSE or National 5 choices, rising to 1 in 2 for students with BTEC qualifications.

UCAS' support for technical education

The interest in alternatives to three-year, full-time, undergraduate degree programmes has grown dramatically over the last decade, meaning the challenge in supporting applicants in making the right choice for them critical. UCAS will therefore be making the case that the HE admissions reform

[3] www.cbi.org.uk/media/3841/12546_tess_2019.pdf, p.24

consultation launched by the government should be used as an opportunity to explore how technical education and apprenticeships could be integrated into the UCAS application process. Primarily, this could be done by creating a unified results day and offer period so applicants with the whole range of Level 3 qualifications would get their results and then be able to decide between the whole range of technical and academic options at Level 4 and beyond as their next step.

UCAS is also committed to exploring the benefits and practicability of a 'UK shared apprenticeships admissions service' to enable students to consider and connect to all post-secondary education options through UCAS. We are working closely with the Department and the Institute for Apprenticeships and Technical Education to explore this ambition.

Annex A

Multiple equality measure (MEM)

UCAS developed the multiple equality measure (MEM) in 2015. This approach avoids focusing on one measure or metric, which can create blind spots or oversimplify. A multi-factored measure provides a truer understanding of a student's circumstances. Students are assigned to MEM groups (1-5) based on their combination of background characteristics (see Figure 1). Those in MEM group 1 are the most disadvantaged, and those in MEM group 5 are the most advantaged.

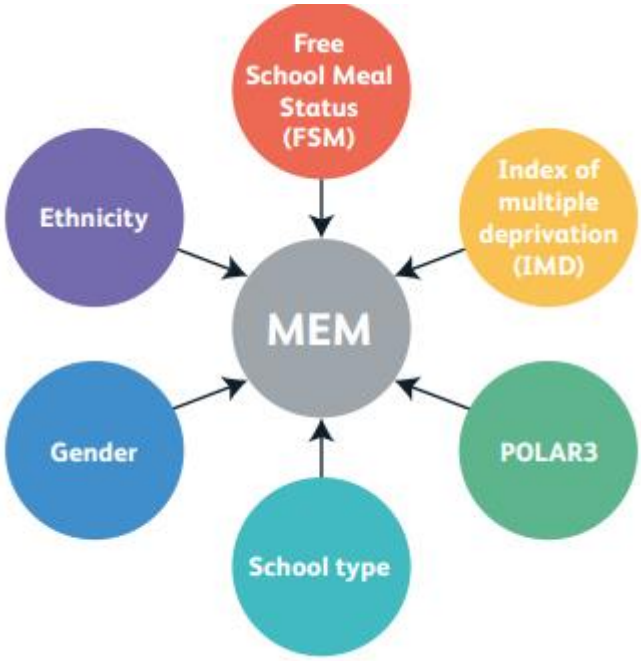

FIGURE 1: Equality factors included in the UCAS MEM