

By email: Post16Level3andBelowReview.CONULTATION@education.gov.uk

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Department for Education consultation on the review of post-16 qualifications at level 3 and below in England

1. The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the Children Act (2004). The DCS acts as a single point of professional leadership and accountability for services for children and young people in a local area, including children's social care and education. ADCS welcomes the opportunity to respond to the Department for Education's (DfE) review of post 16 qualifications at level 3 and below.
2. Although further education (FE) colleges are not maintained by local authorities, DCSs are still accountable for children and young people in their area, including those with Special Educational Needs and Disabilities (SEND) up to the age of 25. It is a statutory responsibility, a moral duty and a personal, social and economic imperative that all young people have the opportunity to pursue a high quality and relevant education beyond the age of 16 and ADCS members are concerned that a narrowing of the school curriculum as well as cuts to school and college budgets has created an education system that is not inclusive for all learners.
3. The consultation and 'case for change' documents argue that there are too many poor quality qualifications available which therefore weakens their value for individuals and employers. The soon to be introduced T levels are described as the "gold standard" level 3 technical qualification meaning that all level 3 and below qualifications that overlap with T Levels and A levels will no longer receive public funding although there is little detail on the development of new pathways to level 3 qualifications to help facilitate these changes. ADCS members are concerned that T Levels and A Levels alone will not meet the learning needs of all young people wanting to progress into further education at level 3. Without sufficient options available, this will severely restrict student choice and may exclude some learners from successfully achieving a recognised qualification at level 3.
4. The removal of funding for other qualifications at Level 3 and below, including some Applied General qualifications, will likely disproportionately impact on learners from disadvantaged backgrounds. The consultation suggests that the review "will have a positive effect on disadvantaged pupils and those with SEND". However, ADCS is concerned that this would not be the case, many learners already benefit from flexible pathways that FE colleges can offer, and these proposals will diminish those opportunities. For example, young people with caring responsibilities, who live in rural areas or who have SEND may not be able to commit to full-time study or the long industry placements required of a

T Level. These young people will benefit from a more flexible pathway and ADCS is clear that those young people who wish to study post-16 should not miss out due to a lack of viable options that cater to their needs.

5. Recent educational reforms have resulted in a narrowing of the school curriculum with increased emphasis placed on more academic subjects that have a greater focus on exams. The impact this has had on children and young people's mental health has been well documented and it is important that FE colleges continue to offer a range of qualifications that meet the needs of all learners. ADCS believes that a high stakes accountability regime in schools has created a far less inclusive education system, yet FE colleges often provide a broad offer that allows many of hitherto lower achieving young people to re-engage with learning. The DfE must therefore ensure that funding remains available for a wide range of qualifications that meet the needs of all children and young people wishing to enter further education.
6. The development and introduction of T Levels presents a valuable opportunity to shift public thinking on vocational learning and offer a high quality route for children and young people. However, for those entering college who are not yet ready for level 3 study, there must be clear routes of progression. Further, T level study and assessment may not suit some learners' needs and abilities despite them having an interest in the subject area. Although the consultation notes that qualifications at level 2 and below should have a strong focus on progression to further study and employment, ADCS members believe that education and learning is more than just about the acquisition of qualifications and for some young people progression to level 3 will not be a viable option. The DfE must therefore recognise the value of qualifications at Level 2 and below that allow many young people to remain in education and achieve a recognised qualification.
7. In 2015, the government raised the participation age to 18 yet funding for FE colleges and sixth forms has not kept pace with increases in the education budget elsewhere. Analysis of public spending by the [Children's Commissioner](#) (2018) found that there has been a 17% real-terms fall in post-16 per pupil spending since 2009/10, a figure echoed more recently by [The Education Policy Institute](#) (2019). The changes to the post-16 curriculum will likely have a financial impact on sixth forms and colleges as they alter course structures or adopt new courses and the DfE must ensure that adequate funding is in place to help with this transition. ADCS is concerned that smaller sixth forms serving more remote communities will particularly find these proposals extremely challenging leading to many of them facing viability and quality issues.
8. FE colleges take in a large number of young people from disadvantaged backgrounds and cuts to the sector have impacted on the availability of student support services which disproportionately impacts on these learners. Some of these young people may be vulnerable to criminal exploitation and it is vital that further education remains accessible as well as offering fully resourced support services that can keep them out of danger. As the government has committed itself to improving social mobility, it seems counter-intuitive not to invest in FE colleges where young people from all backgrounds can achieve a good education that sets them and their community for a successful, positive and

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productive future. Narrowing the range and flexibility of qualifications available at post-16 risks further entrenching social inequality and disadvantage.

For further information or to discuss the issues raised further, please contact Matt Cunningham, ADCS Policy Officer, via matt.cunningham@adcs.org.uk

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