

Review of post-16 qualifications at level 2 and below in England

Level 2 and below qualifications are hugely important for the land-based sector and this proposal is a radical transformation of what will be funded. This is a survey for employers as well as educational professionals and it is strongly recommended that time is taken to respond – even if this is only to a few questions.

These reforms aim to remove duplication, simplify and reduce the number of qualifications available at level 2 and below. Some groups of qualifications are not in scope such as GCSEs and functional skills, but all technical qualifications are included. The Department for Education's impact assessment report estimates that of level 2 in-scope qualifications, 72% for 16-19 year olds and 57% for adults are likely to be lost. This includes a very large number of land-based qualifications including those well recognised and valued by employers. There is a very high risk that 'simplification' and 'removal of duplication' leads to lack of flexibility, which in the land-based sector is crucial to provide skills to the wide variety of sub sectors and different ways that land based businesses operate.

The survey is open until 27th April 2022 and can be completed online here:

<https://consult.education.gov.uk/post-16-qualifications-review-team/review-of-post-16-qualifications-at-level-2-and-be/>

The following document contains summary information from the consultation (in green boxes) and gives the survey questions with our response underneath each box. Please do feel free to use this as a basis for your own submission as the outcomes of this consultation will fundamentally change the level 2 qualifications available to bring people in and develop them in our industries. Consider including examples from your own experience to support the points.

The proposals are that at level 2 and below, only qualifications that fit into certain 'groups' will be funded. Each group outlines the purpose and criteria (e.g. size) that qualifications must meet.

You may want to focus on the following questions:

If any of the following issues are important to you, the most crucial sections are Group 2, Group 3 and Group 6. Specifically questions **7, 8, 9, 21 and 22**.

- If you want level 2 qualifications that are shorter than 1-2 years full time that train people for work.
- If you want level 2 qualifications that cover basic skills, but are adapted for a specific sub sector (e.g. the RHS Qualifications).
- If your sector does not have a level 2 apprenticeship standard and you want level 2 qualifications (e.g. production horticulture, forestry).

If you are interested in level 2 specialist qualifications over and above the apprenticeship standard, then focus on Group 4 (question **10**).

For level 2 short course training that goes across sectors such as machinery, health and safety, ROLO or CSCS answer Group 5 (question **11**)

Right at the end questions **35, 36 and 37** enable general feedback on the implementation and impact of the reforms.

To focus on a specific group or topic use the following table:

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Group 1: Qualifications supporting progression to level 3 technical study

These must:

- Provide students with broad content relevant to a particular technical education route and prepare them for progression to a level 3 technical qualification in that route (e.g. T Level).
- Be small to medium in size, less than half the size of a 16 to 19 study programme, with a guideline size of 120-240 GLH
- Be available to both 16 to 19 year olds and adults

Example:

A small qualification in business administration, providing an overview of the management and administration route and relevant technical knowledge and skills for students looking to progress onto the management and administration T Level route.

Studied over one year, might be linked to the T Level Transition Programme (TTP), broad based

Comment: These could be qualifications that help learners decide what they want to do. It would probably need to be more focused than the whole route, but might help them decide alternatively what apprenticeship they might be able to do if they think a bit more broadly.

6. Do you agree that we should fund qualifications that support progression to level 3 technical provision?

Yes

Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-240 GLH?

Yes

Please give reasons for your answers

There is a need to help learners who are not sure what specialism to follow gain some skills and learn about what their options might be before going on to more specialised further learning. This should not just be for those going on to T Levels but also apprenticeships as these tend to be very specialised and this should not prevent them being funded for a full level 2 apprenticeship. If these qualifications cover the whole route, this will be a challenge for broad routes such as agriculture, environment and animal care. Most learners will know if they are interested in growing, machinery or animals. In addition, there is no technical core content between several pathways in this route, leaving generic topics such as health and safety, sustainability and business skills. This makes for a very dry programme that most learners will not engage well with, will cover content they are not interested in and be too broad to be useful. Grouping occupations into logical sections will mean that learners are not being taught about sub sectors they have no interest in and enable meaningful transferrable skills to be taught. There are already level 2 qualifications that provide entry to other training and an introduction to sectors such as: City & Guilds Level 2 Certificate in Forestry and Arboriculture, SEG Awards Level 2 Award in Practical Environmental and Conservation Skills (85 GLH) and Level 2 Award in Practical Horticulture Skills (75 GLH). These are smaller – approximately 90 credits. These are valuable qualifications, and it would be useful to make some smaller qualifications suitable for this group.

Group 2: Technical qualifications enabling entry into occupations at level 2 ('occupational-entry qualifications')

These must:

- Align to an employer-led occupational standard at level 2
- Ensure students who attain the qualification are sufficiently competent to enter the occupation without substantive further training.
- Include an appropriate blend of
 - suitable knowledge to support wider contextual understanding of the route
 - theory, concepts and core skills (such as communication, project management and teamwork) to support adaptability and practical application
 - the occupationally specific technical knowledge, skills and behaviours required to enter a specific occupation.

- Be substantial in size (more than half of a 16 to 19 study programme) and designed to be delivered to 16 to 19 year olds over two academic years, with a guideline minimum size of 540 GLH.
- Be available to both 16 to 19 year olds and adults.

We are consulting on two different options for the main qualification offer that should be available to 16 to 19 year olds aiming to enter an occupation at level 2:

Option A – Group 2 qualifications only

Option B – Group 2 qualifications, plus the alternative of taking two medium sized occupational-focus qualifications (from group 3) in different routes over two years, with a guideline size of around 350 GLH per qualification

7. Do you agree that we should fund occupational-entry qualifications leading to employment at level 2?

Yes

Do you agree that these qualifications should include broad route-specific content as well as the knowledge, skills and behaviours required to enter an occupation?

No

Do you agree that these qualifications should be large in size (minimum 540 GLH)?

No

Please give reasons for your answers

In land-based industry where occupations are not clearly defined and standards are discouraged by IFATE at adjacent levels, the apprenticeship will be placed where there is most need. In sectors where there are no level 2 standards, there should be the opportunity for a level 2 qualification, for example forestry or production horticulture. A level 2 qualification will be sufficient to make them a useful worker for many employers. Also, apprenticeship standards are written to provide core transferable occupations and do not reflect the full diversity of skills required. Current qualifications have more flexibility than apprenticeships as they do not need to restrict themselves to skills most employers will use and can include them as options, examples might be skills such as fruit or vegetable growing, artificial turf, green roofs, garden interpretation. This flexibility will be a loss to sectors where roles vary widely, such as much of the land-based sector.

This is much larger than the current qualifications, that are adequate to teach to an occupation. The Work Based Diplomas are at around the 280 GLH and the most respected qualifications (without additional functional skills), for example RHS Level 2 Certificate in The Principles and Practices of Horticulture, BTEC and City and Guilds Technicals, are no larger than 380GLH. 540 GLH seems unnecessarily long, will be daunting for learners at this size to undertake and difficult for employers (especially smaller businesses) to commit the staff time to. Many land-based learners are not traditionally 'academic' and need to build their qualifications in a modular way, being equally true for adults and young people. For many learners this will be their first experience of post school qualifications. This risks a high drop-out rate leading to the learner leaving with no qualifications and a negative experience.

A wider understanding of their occupational area would be beneficial, but the full route is too broad to be meaningful or of interest to learners who have already specialised in an occupation. In the Agriculture, Animal Care and Environment Route, understanding one of the sub sectors (for example horticulture) would be significant learning as it has five major sub sectors and numerous smaller specialisms. The full route would cover diverse occupational areas from land-based engineering to veterinary nursing, agriculture, forestry and floristry. It also risks learners losing interest as someone who wants to do floristry is unlikely to want to know much about forestry or agriculture.

8. For 16 to 19 year olds aiming to enter employment in an occupation at level 2, do you agree that the main qualification offer that should be available is

- Option A: Group 2 qualifications only
- **Option B: Group 2 qualifications and the alternative of taking two smaller occupational-focus qualifications from group 3 (around 350 GLH) in two different occupational routes?**

Please give reasons for your answer

Two smaller qualifications provides flexibility, particularly in land-based where occupations tend not to be clearly defined and some roles do not fit neatly onto the occupational map. It would also enable learners to get one qualification completed, before doing a second one. This might be less daunting and more likely to succeed, thereby reducing dropout rates. This is a large amount of learning for most learners – one 350 GLH qualification would normally be sufficient to train for an occupation in horticulture, arboriculture or forestry. Two would equate to 700 GLH – much larger than this. An example of a valued qualification at this size is the RHS Level 2 Certificate in The Principles and Practices of Horticulture (240GLH). This would be sufficient for learners to achieve skilled employment.

9. Do you agree that these qualifications should be delivered to 16 to 19 year olds over two academic years as part of a wider study programme leading to employment?

No

Please give reasons for your answer

Two years study is absolutely fine, but they can still gain enough skills to be useful in the workforce in one year. Many learners prefer to do a one-year course and then go into the workforce rather than committing to two years of study.

If you believe there are any groups of students or occupational routes for which a substantial qualification taken as part of a two-year programme would be unsuitable, please provide details

Learners of any age who have had negative experiences of learning, or who are reluctant to learn will find this a very daunting undertaking in one qualification. Adult career changers and those returning to learning after time in industry will also find this a lot to commit to in one go. It is very common in our sector to complete a shorter programme of learning and then 'top up' to the larger programme. Also, some will hope to do the longer programme but find it very difficult, but can still complete the shorter qualification so they leave with a certificate that reflects the amount of learning that they achieved.

Group 4: Specialist qualifications

Focus on specialist skills and knowledge which are not included in the level 2 occupational standard but are recognised by employers as adding value to an individual's career prospects by providing additional specialist competence

- Be available to both 16 to 19 year olds and adults, who are working towards (or have already gained) entry-level competence in a level 2 occupation
- Be small to medium in size, with a guideline maximum of 200 GLH

Example

A qualification in nutrition in early years and childcare settings, providing more specialist skills and knowledge in nutrition which go beyond that covered in the 'early years practitioner' standard.

10. Do you agree that we should fund specialist qualifications at level 2?

Yes

If you agree, are there any examples of qualifications that you think might fall into this group?

There are examples such as green roofs, artificial turf installation, tree inspection. Currently this need is also met through contextualised qualifications (RHS Qualifications) or through additional options in our larger qualifications (e.g. City & Guilds Technicals or BETCs). Examples of specialisms might include heritage gardening, garden design, horticultural therapy, retail horticulture, green roofs, hydroponics, kitchen gardens or working with plant collections, garden interpretation, propagation.

Specialist skills should not be tied to an area of the apprenticeship standard in their occupational area, but go wider reflecting the diversity of roles in land-based sectors. There is a huge need for specialist level 2 skills in areas that have important skills needs, but do not warrant a level 2 standard.

Group 5: Qualifications supporting cross-sectoral skills

Perform a function/functions that are part of multiple occupational standards but do not result in occupational competence.

- Be small in size, with a guideline maximum of 150 GLH.

Example

Qualifications in health and safety.

11. Do you agree that we should fund qualifications at level 2 that develop cross-sectoral skills for young people?

Yes

If you agree, are there any examples of qualifications that you think might fall into this group?

Health and Safety, First Aid at Work, CSCS (and associated schemes e.g. Landscape Industry Sector Scheme), ROLO site safety training, pesticide application, generalist machinery use (tractors, trailers, chainsaws, quad bikes, forestry clearing saws, chippers, brushcutters, hedge cutters). Sustainability, IT, customer care, basic project management. If specialist qualifications remain at 200GLH then also topics that may be part of one standard by required

in smaller amounts by another occupation such as arboriculture, estate skills, retail, habitat work etc..

Group 7: Qualifications supporting progression to level 3 academic study

Provide introductory content in a specialist subject area, thereby supporting progression to a level 3 academic qualification which is in the same specialist area and is offered as an alternative to A levels.

- Include content that is substantially different from GCSEs.
- Be small to medium in size (less than half of a 16 to 19 study programme), with a guideline size of 120-240 GLH, so they can be delivered as part of a broader study programme that prepares students for further academic study and allows time for GCSE resits where needed.
- Be available to both 16 to 19 year olds and adults.

OR

- Be a small, graded qualification in performing arts (for example grades in a musical instrument) or
- A Higher Project Qualification (NB This is an independent learning level 2 qualification that is often done alongside GCSE or at college).

12. Do you agree that we should fund qualifications to support progression to specialist level 3 academic qualifications?

Yes

Do you agree that qualifications in this group should be small-medium sized, with a guideline size of 120-240 GLH?

Yes

Please give reasons for your answers

This should not be simply progression to specialist level 3 academic qualifications, but should also include specialist technical qualifications. A GCSE-style qualification in horticulture, for example, would build the confidence, skills and awareness of young people who may wish to progress into vocational training. This qualification could assist young people in progressing to a T Level, or into an Apprenticeship. Also, this qualification at level 2 should not negate the opportunity to progress to an Apprenticeship at the same level – for example, somebody with this qualification in horticulture should be able to progress to a L2 Apprenticeship.

13. Do you agree that we should continue to fund level 2 performing arts graded exams in their current form?

Yes

Please give reasons for your answer

No comment

Do you agree that we should continue to fund level 2 Higher Project Qualifications in their current form?

Yes

Please give reasons for your answer

No comment

Group 9: Level 1 pre-technical qualifications

Qualifications which:

- support progression onto a level 2 technical qualification that provides direct entry into a level 2 occupation, or
- support progression, potentially via a level 2 qualification, to a level 3 qualification which provides entry to a level 3 occupation

To be in scope for funding these qualifications must:

- Be small to medium in size, with a guideline size of 120-280 GLH
- Be available to both 16 to 19 year olds and adults

Example

A level 1 qualification providing an overview of the catering and hospitality route, as well as some introductory technical skills.

14. Do you agree that we should fund level 1 pre-technical qualifications which focus on progression to level 2 and provide an introduction to the relevant occupational route?

No

Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-280 GLH?

No

Please give reasons for your answers

Progression to L2 should not be a pre-requisite, nor should giving an overview of an occupational route. Many other benefits can be gained from L1 qualifications such as life-skills, improvement in confidence, behaviours, social skills, physical skills and communication, and these benefits should continue to be acknowledged and supported by the funding system. In land based sector these qualifications are often used for community projects and with disadvantaged groups. They do not plan to enter occupations or progress, but these qualifications can be transformational, firstly for the achievement and the life skills, but also the unplanned progression that can happen on the back of this achievement. The size of 120 GLH is far too large to serve these audiences and to be accessible to learners. An example is the Open College Network Level 1 Award in Forestry In the Community. This is only 40 GLH, deliberately kept small to make it accessible to as wider range of people as possible. It can be done in an afternoon a week over a school year or as a short intensive course for young people currently unemployed but not yet ready for a level 2 apprenticeship. The main goal is to build

confidence, so it does not need to have a large amount of learning – it could be developed to a year with more practical skills, but this is not what the audience required.

Group 10: Level 1 qualifications which may serve as a prerequisite to employment

A small number of qualifications which may serve as a prerequisite for employment, including those which are linked to occupational regulation in certain routes.

To be in scope for funding these qualifications must:

- Be necessary due to being linked to occupational regulation
- Be available to 16 to 19 year olds and adults
- Be small, with a guideline maximum size of 100 GLH

Example

Qualifications could include health and safety qualifications that could help to secure a CSCS card to access work in the on-site construction pathway

15. Do you agree that we should fund level 1 qualifications which act as a prerequisite to employment?

Yes

Please give reasons for your answer

Group 11: Level 1 qualifications which are complementary to a study programme

a small number of qualifications that are designed to be taken alongside a student's main programme of study but do not form the core aim of a study programme

To be in scope for funding these qualifications must be:

- Designed to be taken alongside a student's main programme of study
- Available to 16 to 19 year olds and adults

Example

Qualifications in this group are limited to level 1 performing arts graded qualifications and Foundation Project Qualifications.

16. Do you agree that we should continue to fund level 1 graded qualifications in performing arts in their current form?

Yes

Please give reasons for your answer

No comment

Do you agree that we should continue to fund level 1 Foundation Project Qualifications in their current form?

Yes

Please give reasons for your answer

No comment

Group 14: Entry level pre-technical qualifications

entry level 3 qualifications which lead directly to a level 1 pre- technical qualification

To be in scope for funding these qualifications must:

- Be high-quality and equivalent to entry level 3
- Be small to medium in size (less than half the size of a 16 to 19 study programme), with a guideline size of 120-280 GLH
- Be available to both 16 to 19 year olds and adults

Example

A qualification providing an overview of the hair and beauty occupational route and providing a taster of different occupations within that route.

17. Do you agree that we should fund entry level 3 pre-technical qualifications that support progression to level 1 study?

Yes

Do you agree that, for 16 to 19 year olds, qualifications in this group should be small to medium sized, with a guideline size of 120-280 GLH?

No

Please give reasons for your answers

This will sometimes be too large. Entry and L1 qualifications could be smaller than 120GLH. In land based sector these qualifications are often used for community projects, often with disadvantaged groups. They do not plan to enter occupations or progress, but these qualifications can be transformational firstly for the achievement and the life skills, but also the progression that can happen on the back of this achievement.

Group 15: Entry level qualifications which are complementary to a study programme

We propose to fund qualifications at entry level which allow students to develop additional skills and are complementary to a study programme. These are performing arts graded examination qualifications

To be in scope for funding these qualifications must:

- Be entry level performing arts graded qualifications
- Be available to both 16 to 19 year olds and adults

18. Do you agree that we should continue to fund entry level graded qualifications in performing arts in their current form?

Yes

Please give reasons for your answer

No comment

Supporting adults: Design and delivery principles

19. Do you agree that the design and delivery principles outlined in paragraphs 150 to 155 will ensure that level 2 technical qualifications are accessible to adults?

No

Please give reasons for your answer

In the adults' section of the consultation, the document leans heavily towards adults who are 'low skilled, low paid and disadvantaged'. While funding for these groups is, of course, vital, it is imperative that funding is retained for adults who do not fit this group and who are already-skilled career changers. The horticultural industry is heavily reliant on this group for its workforce.

Paragraph 153 – the idea of modular delivery is strongly supported, but this needs to enable learners to commit to smaller modules (these might be significant learning – 120 GLH) rather than the whole qualification. This should be supported by a system that accredits the learning that they have achieved. Both employers and learners (of any age) are often daunted if they have to commit to long programme of learning, but may achieve this if they can undertake smaller modules one at a time. Learners who need to take breaks for family reasons or who need space between modules before they are able to move to the next one need their learning to be recognised and certificated.

Paragraph 154 will require all providers to assess learners and tailor the programme for them. Prior learning works well if they have an accredited short course covering part of the qualification, but this approach has problems when looking at skills developed in the work place. It can make delivery very fragmented and challenging for both learner and training providers and significantly impact on achievement of synoptic assessments where they have not been trained in all elements. In addition, practices can change rapidly in some topics including health and safety, sustainability, science and techniques underpinned by science. Learning from 5 years ago can be outdated if not refreshed. They may not be working the standard required across the skills and knowledge.

Paragraph 155 - assessment methods that bring skills together are strongly supported, but lessons should be learnt from apprenticeships and the challenge that end tests can provide for some learners (as one form of summative assessment).

Level 2 qualifications for adults – groups for funding

20. Do you agree that we should fund the following level 2 qualification groups for adult learners:

	Yes	No
Group 1: Qualifications supporting progression to level 3 technical study	yes	
Group 2: Occupational-entry qualifications	yes	
Group 4: Specialist qualifications	yes	
Group 5: Qualifications supporting cross-sectoral skills	yes	

Group 7: Qualifications supporting progression to level 3 academic study	yes	
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Please give reasons for your answers

Adult learners are a diverse audience and many are career changers or employees who come to learning later in life after working in a role for some time. They need a range of options to choose from that suit their needs.

Group 3: Occupational-focus qualifications for adults

Level 2 qualifications 2 to provide adults with entry into a particular occupation and will not need to be delivered as part of a study programme. They will be smaller than the substantial entry-level competence qualifications in group 2, as they will have less focus on route-wide content and transferable skills, and therefore will be a more accessible option for adults. We ask, on page 42, question 8, whether these qualifications should also be available to 16 to 19 year olds in certain circumstances.

To be in scope for funding these qualifications must:

- Be focused on providing technical content which is aligned to an employer-led occupational standard and provides entry into a level 2 occupation, with only a small proportion of the qualification dedicated to route-wide content.
- Be of medium size, smaller than the group 2 occupational-entry level 2 qualifications.
- Be available to adults only. (Subject to question 8 on page 42)

Example:

A medium sized qualification in hair and beauty providing the occupationally specific technical knowledge, skills and behaviours required to become a nail technician (aligned with the 'nail services technician' standard).

21. Do you agree that we should fund occupational-focus qualifications at level 2 for adults?

Yes

Do you agree that these qualifications should be medium sized, with a guideline size of 200-540 GLH?

No

Please give reasons for your answers

Qualifications should have the flexibility to specialise further than the apprenticeships. For example, the occupational standards for horticulture are very broad and have been designed to introduce learners to a whole sector giving them core transferrable skills. Learners will 'specialise' into a part of the sector (for example maintenance gardening; public, botanical and heritage gardening; landscaping) by choosing which employer they work with alongside delivery of the standard. Adult learners (for example career changers) usually have more understanding of the sub-sector they wish to specialise in, and so provision should be provided for standards to be rationalised to a specific area of the sector.

This is still a large qualification size. Many career changers will do several qualifications while working at 90 to 200 credit lengths, building up to the equivalent of a larger qualification on weekends or evenings. It should be possible for learners to commit to smaller amounts of learning as this is still a daunting amount for some. This does not work if an end point assessment model is used.

Group 6: Technical qualifications enabling entry into occupations without employer-led occupational standards

To be in scope for funding these qualifications must:

- Support progression into sustainable level 2 occupations where an employer-led occupational standard does not exist
- Be available to adults only

Example:

A qualification providing the technical knowledge, skills and behaviours necessary to become a hospital porter.

22. Do you agree that we should consider requests to fund level 2 qualifications for occupations for which an employer-led occupational standard does not currently exist?

Yes

Please give reasons for your answer

The occupational map was designed for apprenticeships, not college-based qualifications. The map needs expanding, or this group must be flexible enough to include related occupations that have not been listed specifically on the map.

Sub sector specialisms are required that are not great enough to warrant an option on the apprenticeship. Current qualifications have this additional flexibility and specialism and it is crucial that it is not lost to enable suitably skilled workforce to be developed. It is easier for an employer to contextualise and specialise a learner while they are doing an apprenticeship on the job than would be possible in a college environment. The occupational map would need revision and these sub sector specialisms recognising.

For example, horticulture has many sub sectors including parks, botanical gardens, heritage gardens, domestic gardens, grounds maintenance (business parks, retail spaces) and landscape construction. The RHS qualifications are well suited to those who wish to work in high maintenance environments such as public, botanical and heritage environments and are very highly valued. Over 3,000 candidates gain an RHS qualification each year and a large proportion of these are moving into, or upskilling within the horticultural industry. The industry would suffer without them. This model does not recognise these needs and the occupational map needs to become more nuanced as well as recognising large 'gaps' that are missing. For evidence of skills requirements not met by this structure please see the Horticulture Sector Skills Survey Report (<https://www.rhs.org.uk/science/pdf/horticulture-skills-report/horticulture-sector-skills-survey-report.pdf>).

The occupational map rarely has adjacent levels as this is discouraged in apprenticeships. Therefore, where there is a level 3 role on the map, but no level 2 role for example forestry and production horticulture, sectors require the opportunity for level 2 qualifications. These qualifications can lead to work or to progression and are more accessible to many learners than level 3.

Are you aware of any occupations that are in demand by employers but where an employer-led occupational standard does not currently exist?

Yes

Please provide example(s)

The RHS qualifications are well suited to those who wish to work in high maintenance environments such as public, botanical and heritage environments and are very highly valued. Over 3,000 candidates gain an RHS qualification each year and a large proportion of these are moving into, or upskilling in the horticultural industry. The industry would suffer without them.

Forestry has an occupation that sits between level 2 and 3. Forest Operative at level 2 has been revised and written up to a full level three (now Forest Craftsperson) where the most need is, but there are many workers at level 2 who are important in the workforce.

Do you agree that these qualifications should be available to adults only?

No

Please give reasons for your answer

Some young people have a clear idea of what occupation and sub sector they wish to work in and should be able to take the most appropriate qualification to meet their career goals. An example would be that the RHS Qualifications are used in schools. Where you have a level 3 standard, but no level 2, a level 2 qualification may be much more attainable for a learner with less maturity.

Level 1 qualifications for adults

Group 9: Level 1 pre-technical qualifications. Adults will be able to access level 1 qualifications which lead directly onto level 2 qualifications that provide entry into occupations at level 2. These qualifications will provide an overview of the occupational route as well as some introductory technical skills, with a focus on progression to further study. We would expect these qualifications to be small to medium size, depending on the route.

Group 10: Level 1 qualifications that act as a prerequisite to employment. These may be linked to occupational regulation, helping adults gain access to employment where they may be able to then learn on the job in order to become competent in an occupation, for example qualifications in health and safety.

Group 11: Level 1 qualifications providing additional and complementary skills. These are performing arts graded qualifications: small, performance-focused qualifications in the area of music, dance, drama and communication, and musical theatre. These qualifications allow students to progress onto higher levels with the ultimate aim of gaining a mastery of practical performance skill. These will be available for those adults who would benefit from taking them.

23. Do you agree that we should fund the following qualification groups at level 1 for adult learners:

	Yes	No
Group 9: Level 1 pre-technical qualifications supporting progression to level 2 study	x	
Group 10: Level 1 qualifications serving as a prerequisite to employment	x	
Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications	x	

Please give reasons for your answer

No further comment

Groups 14 & 15 Entry Level Qualifications for adults

Group 14: Entry level 3 pre-technical qualifications. For adult students who need to begin at entry level, there should be qualifications that engage them and support progression to higher levels. These qualifications lead directly onto a level 1 qualification, aligned to an occupational route, as part of an eventual progression route to occupational competence at level 2 and above. These qualifications should provide an overview of the route and may provide a taster of different occupational areas. We would expect these qualifications to be small to medium size.

Group 15: Entry level qualifications providing additional and complementary skills. Performing arts graded qualifications at entry levels 1, 2 and 3 will also be available for adults looking to gain foundation knowledge and progress onto higher grades to develop their practical performance skill.

24. Do you agree that we should fund the following qualification groups at entry level for adults:

	Yes	No
Group 14: Entry level 3 pre-technical qualifications supporting progression to level 1	X	
Group 15: Entry level performing arts graded qualifications	x	

Please give reasons for your answer

No further comment.

Groups 12 and 16: English and maths qualifications (non FSQ/GCSE)

We propose continuing to fund at level 1 and entry level (including sub levels) high-quality English and maths qualifications that deliver basic literacy and numeracy for those who cannot directly access FSQ and GCSE.

- We propose to remove funding at level 2 for non-GCSE/FSQ English and maths qualifications.

- We propose to consider the need for updating the National Standards for Adult Literacy and Numeracy

To be in scope for funding these qualifications must:

- Be developed against National Standards for Adult Literacy and Numeracy
- Be designed to support those who cannot access FSQ / GCSE

Example:

An entry level or level 1 qualification in English or maths skills that builds confidence and ability for learners who need support to access an FSQ/GCSE.

25. Do you agree we should remove funding at level 2 for non-GCSE/FSQ English qualifications?

Yes

Please give reasons for your answer

Currently there appears to be too much variation of what is available, and it is very confusing for learners, employers and providers to know what has been covered within the qualifications. At this level it is better to have a broad general English qualification that demonstrates application of skill and knowledge rather than specialised bite sized components. This will be more effective as a stepping stone to a higher level and more specialised qualification.

Do you agree we should remove funding at level 2 for non-GCSE/FSQ maths qualifications?

Yes

Currently there appears to be too much variation of what is available, and it is very confusing for learners, employers and providers to know what has been covered within the qualifications. At this level it is better to have a broad general maths qualification that demonstrates application of skill and knowledge rather than specialised bite sized components. This will be more effective as a stepping stone to a higher level and more specialised qualification.

6. Do you agree we should continue to fund level 1 and entry level English qualifications for learners who cannot access FSQs/ GCSEs?

Yes

There is a considerable need to build learners skills and confidence in their ability to undertake English qualifications for those who have struggled at school and have not managed to achieve an acceptable grade at GCSE. Very often they need to undertake smaller, bite sized components to build their confidence in undertaking focussed tests to build towards a broader skill set that will enable them to achieve either FSQ or GCSEs in order to be successful as they progress onto an apprenticeship or a technical qualification.

Do you agree that we should continue to fund level 1 and entry level maths qualifications for learners who cannot access FSQs/GCSEs?

Yes

There is a considerable need to build learners skills and confidence in their ability to undertake maths qualifications for those who have struggled at school and have not managed to achieve

an acceptable grade at GCSE. Very often they need to undertake smaller, bite sized components to build their confidence in undertaking focussed tests to build towards a broader skill set that will enable them to achieve either FSQ or GCSEs in order to be successful as they progress onto an apprenticeship or a technical qualification.

27. Do you agree all non-GCSE/FSQ qualifications in English should be developed against the National Standards for Adult Literacy and Numeracy?

Yes

The National Standards provide a complete breakdown of the skills and understanding required in order for the learner to become an effective communicator. Therefore, it would appear sensible to use that framework to develop suitable steppingstone components in order for a learner to be able to progress if they have the capability. Whilst at the same time reducing the number of smaller qualifications that are available currently that do not align so well to the FSQ & GCSE's to effectively support progression.

Do you agree all non-GCSE/FSQ qualifications in maths should be developed against the National Standards for Adult Literacy and Numeracy?

Yes

The National Standards provide a complete breakdown of the skills and understanding required in order for the learner to become an effective communicator. Therefore, it would appear sensible to use that framework to develop suitable steppingstone components in order for a learner to be able to progress if they have the capability. Whilst at the same time reducing the number of smaller qualifications that are available currently that do not align so well to the FSQ & GCSE's to effectively support progression.

28. Do you agree that we should consider updating the National Standards for Adult Literacy and Numeracy before adding them to the regulation criteria?

Yes

To ensure they align accurately to the National Curriculum as is appropriate for life and work skills required for 2022

Groups 8, 13 and 17: ESOL (English for Speakers of Other Languages) qualifications

We propose to continue to fund high-quality ESOL qualifications at level 2 (group 8), level 1 (group 13) and entry levels 1,2 and 3 (group 17). Qualifications named ESOL Skills for Life are in scope of this review. ESOL International qualifications are out of scope.

To be in scope for funding these qualifications must:

Continue to meet the requirements of the National Standards for Adult Literacy.

Example:

Qualifications in reading, writing, speaking and listening, designed to support speakers of other languages within the UK to develop their English language skills for work, further learning or everyday life.

29. Do you agree that we should continue to fund ESOL qualifications at each of the following levels:

	Yes	No
Level 2	x	
Level 1	x	
Entry level (including sub levels 1, 2 and 3)	x	

Please give reasons for your answer

There is potentially a huge market to tap into around immigration and those that get their 'right to stay', once they have this, they can start looking for work, but may not have very good English. This shouldn't be a barrier to employment.

Personal, Social and Employability (PSE) qualifications

Standards will be developed for qualifications that deliver:

Personal and Social Development

We anticipate this standard would include content designed to improve a student's communication and interpersonal skills, develop confidence and resilience, prepare them for further study and progression, and prepare them to engage with the local community and wider society.

Employability Skills

We anticipate this standard would include content designed to prepare a student to find and secure employment, such as job searches, CV writing and interview skills, and to teach the essential skills for the work environment, such as workplace communications, teamwork and problem solving, health and safety at work, and employee rights and responsibilities.

Independent Living and Life Skills

We anticipate this standard would include content designed to prepare a student for adulthood and independent living, such as managing physical and mental health, relationships, maintaining a home, tenant rights and responsibilities, independent travel skills, and financial management skills.

30. Do you agree that we should develop national standards and set broad core content at level 1 for:

	Yes	No
Personal and social development	X	
Employability skills	X	
Independent living and life skills	X	

Please give reasons for your answer

This is combined in a lot of entry and level 1 quals to improve confidence, it is also useful for those that have been out of employment for a while.

31. Do you agree that we should develop national standards and set broad core content at entry level (including entry level 1, entry level 2, and entry level 3) for:

	Yes	No
Personal and social development	X	
Employability skills	X	
Independent living and life skills	X	

Please give reasons for your answer

This is combined in a lot of entry and level 1 quals to improve confidence, it is also useful for those that have been out of employment for a while.

32. Do you agree the national standards set out on page 86 will cover the range of skills needed by students?

Yes

Do you believe there is a need to develop additional national standards? If so, please tell us what the standard should contain and which students it would benefit

33. Thinking specifically about employability skills:

As an employer, do you currently recognise or value any qualifications in employability skills?

Yes No

If so, how do you recognise them and what aspects of these qualifications do you value?

Will the proposed national standards make a difference to the way these qualifications are perceived, valued or recognised by employers

Yes No

If so, what difference will they make and how would employability qualifications aligned to standards be used by employers in the future?

34. Is it necessary to have standalone qualifications at entry level 1 and entry level 2 that provide students with an opportunity to explore industries and occupations?

Yes

Please give reasons for your answer

Apprenticeships tend to specialise more quickly than qualifications due to how they are developed. Therefore there is a recognised need for qualifications that help people understand what their options are and gain some basic insight as a stepping stone to enrolling on a full apprenticeship standard.

Implementing reform

35. What support is needed to smooth the implementation of the proposed reforms to level 2 and below qualifications?

A review of the occupational maps to make sure that they are fit for this purpose – much more nuance than is needed than for apprenticeships.

A clear focus on low enrolment qualifications that meet specific sub sector needs. Recognition that these qualifications may go beyond the occupational standard but will train them for a particular type of work. Work based learning will naturally mean that the learner will pick up sub sector specialism, but in a college-based environment they this will not occur.

Consideration of what 'modular' learning might look like and recognition that some adults and young people take time to build up their skills to achieve the large amounts of learning required for the majority of the main level 2 qualification groups. Very many adults and young people do a first-year qualification (certificate) before they then 'top up' to a larger amount of learning (often a diploma).

Recognition that there will be significant costs associated with these changes for both training and assessment providers and suitable support to make sure that lower volume sectors will have qualifications developed in a timely fashion as well as the larger ones.

A communication strategy for employers to help them understand the changes and their benefits. Employers have seen significant changes to vocational education over recent years and this can lead to them becoming confused and be a barrier to them engaging with qualifications for their staff.

Clarification over whether one qualification could sit in more than one group. For example, could an RHS qualification sit in both group 6 (adults) and group 7 (supporting to L3 study)? If not, then groups 3 and 6 also need to be available to young people.

General and equalities impact assessments

36. Do you have any concerns regarding the potential impact that the principles and proposals outlined in this consultation may have on students with SEND or those with a protected characteristic under the Equality Act 2010?

The very large minimum size of many of the qualification groups proposed is a huge concern for learner accessibility. This will not just impact those with SEND but all learners who are reluctant to learn – they need to see achievements in manageable pieces so that they can build up their skills and their confidence over time. These learners will not engage well with such large qualifications irrespective of their age. Although the ideal of large qualifications and full occupational competence for all is admirable, in practice employers take on people with a range of different skill levels and this should not be to the detriment of accessibility to learning. Most of these qualifications will be inaccessible to SEND learners, especially those with the capability to progress to a level 2.

37. Are there any additional impacts that you think should be included in the general impact assessment which will accompany our response to this consultation?

Disruption and loss of well respected, recognised, valued and needed qualifications leading to frustration from employers. This will alienate employers to the skills system and bring the educational sector into disrepute. The loss of some of these qualifications will impede economic growth in specific sectors by reducing and slowing the availability of labour as demonstrated in the Growing a Green Economy report (<https://www.rhs.org.uk/science/pdf/industry-growth-report-ohrg.pdf>). The size of these qualifications makes them much less accessible, impacting on the levelling up agenda, but also preventing valuable workers being able to access the labour market.

These reforms will suit larger businesses better than smaller ones, who often need a more focused skill set, or more flexible skill sets. They will not be able to commit their staff time to the large size of these qualifications, especially given they are less likely to benefit from the full breadth of skills being delivered.

The risk of not making provision for established qualifications, is that industries need them, and would find other ways to deliver them. The proposed structure lacks their sub sector needs and may be much larger than they require. This would lead to qualifications turning into non-regulated courses, and so the same training would be offered, but without regulation, and therefore we would see a drop in standards. There will also be an increase in low quality in-house training, reducing the quality and transferability of learning and undermining the viability of training provision.

The range of needs of all adult learners should be considered and funded, not just those who are currently 'low-skilled, low-paid and disadvantaged'. The current tone of this document suggests that this group will be the focus of funding. Many level 2 land based learners and workers would not identify with this description.

Disruption to awarding organisations and training providers will cause significant costs. This will accelerate the trend towards them focusing on the highest value sectors and pulling out from lower volume, higher cost delivery such as land based. These qualifications underpin our primary production sectors for food, wood and a range of other natural products, they manage the landscape, protect biodiversity, habitats and heritage, contribute to mitigation and adaptation to climate change, manage watercourses and mitigate flooding in addition to creating and managing the outdoor environment where people live, work, shop and spend leisure time. Relative low volume and more expensive delivery does not mean these qualifications are 'niche' or unimportant.