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IoD response to the Post-16 Level 3 and Below Pathways consultation

About the IoD

The IoD is an independent, non-party political organisation representing 20,000 company directors, senior business leaders, and entrepreneurs. It is the UK's longest-running organisation for professional leaders, having been founded in 1903 and incorporated by Royal Charter in 1906. Its aim is to promote good governance and ensure high levels of skills and integrity among directors of organisations. It campaigns on issues of importance to its members and to the wider business community with the aim of fostering a climate favourable to entrepreneurial activity in the UK.

The IoD welcomes the opportunity to respond to this consultation on *Post-16 Level 3 and Below Pathways*. Developing a high-quality vocational and technical education system is of considerable interest to the IoD and its membership, and we are therefore pleased to present our views.

The introduction of V Levels represents a welcome opportunity to simplify the 16-19 education system. However, the challenges in securing employer and student take up for T Levels, alongside the fact that the demise of BTECs represent the loss of a qualification which is widely recognised and understood by employers, are such that V Levels need to be carefully designed with employer engagement at their core.

1. We are proposing V Levels will be 360 guided learning hours (GLH) to enable students to combine them with other V Levels and A levels. Where larger subjects are needed, we propose that these are offered through T Levels.

In taking this approach, are there any risks or issues we need to be aware of?

The elimination of medium-sized technical qualifications at Level 3 presents a significant risk to student choice and the work readiness of school and college leavers.

First, in forcing a binary choice between smaller V Levels (whether paired with other V Levels or A Levels) or a full T Level, the valuable middle ground — a substantive, occupationally-relevant technical qualification equivalent to 2 A Levels (like many current BTECs) —will be lost. This risks excluding students who thrive on applied learning but for whom a T Level is not the right choice, whether due to prior attainment or a desire not to fully specialise at Level 3. T Levels cannot be assumed able to fill the gap for 'larger' subjects left behind by a 360 GLH cap on V Levels. The post-16 technical and vocational education system risks losing flexibility by creating a cliff edge for students seeking a significant technical qualification alongside a smaller, supplementary qualification, for example A Level Maths alongside a larger engineering qualification.

Secondly, employers value qualifications which develop substantial technical depth and employability skills. There is therefore a risk that some employers will perceive a 360 GLH V Level as too narrow or shallow compared to current alternatives. A V Level may therefore be viewed as a supplementary qualification rather than a robust pathway into vocational employment.

The system should therefore enable the creation of larger, 720 GLH (or similar) V Level qualifications where there is evidence of employer demand. Such an approach would maintain a crucial pathway for a significant cohort of learners while ensuring the system meets diverse business needs.

2. Are there any particular issues for subjects or students that we need to be aware of as a result of not having medium sized V Levels?

The risks described in our answer to the previous question apply to a range of subjects, albeit for different reasons. In terms of STEM and technical subjects, the first issue is that fields like engineering, applied science, and IT often require substantial guided hours to develop necessary practical and mathematical proficiency. A 360 GLH cap may compromise the ability of the qualification to go into sufficient conceptual depth, failing to prepare students for advanced apprenticeships or technical degrees. The second issue is that, as referenced above, the option to combine a medium sized STEM V Level, such as engineering, with a qualification like A Level Maths would not be available to students.

Issues may arise in creative subjects which benefit from significant amounts of time being devoted to project work, such as Art and Design; a 360 GLH cap would cut the time available to portfolio work, which is often of significant value to employers in assessing the ability of potential employees.

In terms of students, the risks are most acute for those who wish to mix a substantial technical qualification with one A Level and those who want to specialise in a technical subject but for whom T Levels – whether due to prior attainment, difficulties in accessing a T Level placement etc. – are not a viable pathway.

3. Which subjects do you think are most appropriate for delivery through V Levels?

Please provide evidence of relevance to employment sectors or further study.

A significant risk of the proposed reforms as a whole is confusion regarding the differentiation between A Levels, V Levels, and T Levels. The proposed difference in size of V Levels compared with T Levels may lead to a perception that size and ability to extent to which a student is specialising in one subject is the main difference between the qualifications.

Given, however, that T Levels are known to be out of reach of some students with lower prior attainment – who are currently more likely to study BTECs and other applied general qualifications – then it is likely, and indeed desirable, that V Levels do not replicate the level at which T Levels are pitched and in doing so effectively shut out a significant portion of young people who depend on vocational and technical qualifications as a route into employment.

The policy intent behind what differentiates V Level from T Levels in particular therefore needs to be properly understood and articulated before informed commentary on appropriate subjects can be made.

That being said, if government proceeds with 360 GLH parameter, appropriate subjects for V Levels might include those that serve as a complementary or enabling skill set within a broader programme of study such as applied academic subjects, that is, subjects which enhance core A Level study with practical context, such as applied mathematics. V Levels could also be appropriate for subjects which serve as a foundation for – but given their size, not a comprehensive preparation for – specific occupations, such as childcare and accounting.

4. How could current information, advice and guidance be improved or what new guidelines or measures should be developed to ensure that students are informed about V Level subject selection and combinations?

The primary aim of information and guidance (IAG) should be to provide students with an understanding of how various elements of the post-16 system work together and to give them the requisite information to enable them to choose subject and qualification combinations that will enhance their employability and enable them to pursue fulfilling careers.

Supporting students to understand the differences between A Levels, V Levels, and T Levels will be key to success. The promise of the new system lies in coherence and clarity; IAG should therefore focus on the system as a whole, and the potential to draw on multiple pathways where appropriate, rather than on promoting individual pathways.

IAG should also emphasise how the various pathways interact with further options for study and employment, that is, encourage students to see them as part of a longer-term pathway to a career.

> "One of the proposed routes is Finance & Accounting which is a potential win for [our sector], but only if schools, colleges and employers understand how V Levels articulate into Level 3/4 apprenticeships." – 100-249 employees, Education, East of England

Government should consider leveraging digital tools to support IAG relating to all three pathways. For example, a tool which enables students to select a career could suggest the various routes that a student might utilise to pursue that aim. A student who aims to become an engineer, for instance,

might be given information about T Level Engineering, the option of a V Level in Engineering alongside A Level Maths and Physics, as well as a purely A Level-based route.

5. What factors should we consider when creating T Levels where there are currently no level 3 occupational standards?

Please explain your answer.

Employer demand should be central to the creation of new T Levels where there are currently no level 3 occupational standards. Demand should be proven through quantitative data – such as projected job growth, vacancy rates, skills gap analyses – and qualitative consensus from a wide employer coalition, to ensure that the qualification leads to real technical employment.

Prioritising sectors central to UK economic growth – particularly those identified in the recent Industrial Strategy, including adjacent and supporting sectors – would both support growth and align the approach with wider policy direction.

The maturity of the sector in question is an important further consideration, particularly in terms of whether the sector is likely to have capacity to host sufficient industrial placements.

Ensuring that any new T Levels have clear progression pathways – whether Higher Technical Qualifications, degree apprenticeships, or skilled employment – will also be crucial to success.

All of these factors will require extensive, high-quality employer engagement, for which government should utilise employer representative and trade body networks.

17. What non-qualification activities do you think are successful at supporting vocational students to achieve and progress to higher levels of study and employment?

High-quality, meaningful interactions with employers are key to supporting vocational students to achieve and progress to employment.

The 45-day work placement is a strength of the T Level programme but such an approach would be unsuitable for V Levels, for reasons ranging from a lack of employer capacity to host long placements to limited curriculum time available to spare for long placements, both of which have been noted as weaknesses of the T Level rollout[1]. However, engagement with employers will still be essential to securing good employment outcomes for V Level students; employer engagement should be central to the design of the qualifications, rather than treated as an afterthought.

For some V Level courses, it may be appropriate for short work placements to be a mandatory requirement. Other courses may benefit from a more flexible approach to employer engagement, for example in accepting industry mentoring schemes or extended project work with employer-set briefs as alternatives to work placements.

[1] https://www.gov.uk/government/publications/t-level-thematic-review-final-report/t-level-thematic-review-final-report

Any employer engagement built into V Levels will need to reflect the reality of how much capacity employers are likely to have, particularly in light of the government's plans to guarantee two weeks of work experience for every young person. There is a risk that the volume of asks of employers emanating from various parts of the education and employment systems will undermine both employer understanding and willingness to engage.

Government should therefore consider these asks in their totality, from a policy design perspective, to ensure that they are realistic. DfE and DWP should also co-ordinate in their communications with employers and employer networks to present as unified a set of asks as possible. The *Business: find training and employment schemes* section of the Skills for Life campaign website is a good starting point for such an approach, but should be expanded to include, for example, T level placements.

I hope you have found our comments helpful. If you require further information about our views, please do not hesitate to contact us.

With kind regards,

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