



Skills Federation response - Post-16 Level 3 and Below Pathways

About Skills Federation

Skills Federation brings together the shared perspective of different industries on how the UK can build a workforce able to meet our skills needs. Our members are 19 employer led sector skills bodies who work across more than 20 sectors of the economy and represent over 150,000 employers, both large and small, across the UK. They are funded by their industries to provide sectoral voices and vital support on skills issues.

The Skills Federation response

Our response has been developed with our members and provides an employer perspective, about how to ensure the new qualifications prepare learners adequately for work, whether as their next step, or after further study.

We broadly support introducing a new Level 3 pathway. T Levels are valuable, but they don't meet the needs of all students who wish to study at Level 3 study but who don't want to do an apprenticeship. We also support the proposal for new Level 2 pathways, as the current T Level foundation year isn't working. However, these qualifications must deliver up-to-date, relevant skills that match current and future labour market needs.

Our response offers thematic observations rather than addressing each consultation question individually. We recognise that this technical consultation is intended to provide a foundation for the Department for Education (DfE) to begin developing new qualifications. However, we recommend that DfE takes a step back and reviews the purpose and underpinning principles required before beginning the detailed work of designing these qualifications.

Relatedly, we don't think the first qualifications being ready for teaching in 2027 is a realistic deadline and would ask DfE to reconsider this. Rolling out too quickly risks compromising quality and disengaging employers, providers and potential learners.

We propose that the new qualifications need to:

- Support learners to develop the skills needed for the modern workplace
- Form integral elements of coherent progression routes to further study and to work
- Be well understood by young people, parents/carers, employers and the general population
- Be embedded within a broader curriculum that equips young people with the essential transferable and employability skills needed for the workplace.

We have structured our comments around these four principles. We are happy to provide further information if this is useful.

Consultation response

Support learners to develop the skills needed for the modern workplace

It will always be a challenge to ensure that qualifications are current and relevant to the evolving workplace. Skills requirements within occupations change faster than the pace of standards development, qualification design, and processes to agree funding. However, it is crucial that employers recognise the value of these new qualifications, which will only happen if they maintain strong currency and credibility within the labour market.

We propose the following recommendations to help achieve this:

- Create a strategic and systemic way of engaging with sector skills bodies who are the organisations closest to the skills needs of the sectors they represent. They have rich intelligence which can be used by government and the capacity and capability to co-create solutions.
- Work with sector skills bodies to convene employers to input into the content of qualifications to ensure they are fit for purpose. If V Levels are to support learners to progress into work, the input of employers will be needed.
- Require that qualifications are underpinned by occupational standards which detail the knowledge, skills and behaviours required and which are reviewed and refined regularly to ensure relevance to the evolving needs of the workplace.
- Put in place professional development for educators and careers staff. Staff spending time in industry can help ensure that their understanding of workplaces is current. Opportunities for staff in different providers to share challenges and effective practice in delivering the new qualifications could also support skills development.
- Design V Levels with sufficient content but without artificially increasing the number of guided learning hours. This could mean a different size of V Levels in different sectors.

Form integral elements of coherent progression routes to further study and to work

There will need to be seamless links between the Level 2 Further Study pathway and V levels to provide a progression route for learners aren't ready to start at level 3. The new qualifications also need to form part of flexible progression routes into higher education or into work, whether as an apprentice or into a job with the opportunity for other forms of training.

Level 2 pathways

We welcome the questions that relate to flexibility in the Level 2 pathways. We agree that learners should be able to move between the two pathways where needed. However, in practice it may be challenging for one provider to offer both Foundation and Occupational Certificates in the same subject. This underlines the importance of post 16 providers working together to provide a comprehensive offer across areas.

We also agree that the progress for learners who leave early, particularly on the two year Foundation Certificate, needs to be recorded. Modularisation could be explored to do this. Relatedly, where young people leave early to pursue an apprenticeship or other positive destination, this shouldn't count as 'non-completion' for the provider.

It will be essential that a two-tier system is not created at Level 2 where Foundation Certificates are more highly regarded than Occupational Certificates. Both should be considered as important routes to meet the different needs of learners.

Level 2 pathways will need to be of a sufficient length and intensity to engage learners who may need more support.

V Levels

In principle we welcome the flexibility for learners to mix and match A Levels and V Levels. This may, however, be more difficult in practice, particularly in more rural areas. A lower percentage of specialist providers, for example, land based colleges, offer academic alongside vocational technical qualifications. Post 16 providers should work together to plan provision across local areas to ensure a balance of provision and adequate choice for learners.

It will be vital to make learners aware of what combinations of qualifications will lead to which destinations and that V Levels (either taking a single V Level or a combination) will not be a route to all occupations whether directly or after further study. For example, for most regulated healthcare occupations, there is no alternative to a degree and many universities may not accept learners onto a degree programme without a science A-level. Equally, for safety critical sectors it is essential for employers that new entrants can demonstrate occupational competence, and this won't be achieved via V Levels.

Work will need to be done with universities to ensure V Levels are recognised as a valued route to higher education. There are still challenges with HEIs recognising T Levels and lessons need to be learnt from this.

The differentiation between 'T Levels' and 'V Levels' needs to be drawn carefully given that the words 'vocational' and 'technical' are often used both inter-changeably and in different ways. The differences between them can't just relate to the size of the qualifications, but also to their purpose. The consultation document is clear that T Levels will be the choice for young people who already know what role they are interested in, whereas V Levels will be more appropriate for learners who want to explore sectors without specialising. It will be important that that V Levels don't become 'mini T Levels' (and vice versa).

Many applied general qualifications already provide a valuable route for young people into work and higher education and are well understood by employers. When V levels replace these qualifications the timing needs to be considered carefully to avoid destabilising the system. Qualifications should not be defunded until there is an alternative in place.

Be well understood by young people, parents/carers, employers and the general population

Awareness raising is integral to the roll-out of the new qualifications. Young people and their parents and carers need to understand the options and which will best support achievement of their ambitions. Employers need to understand what mix of technical, practical, and transferable skills learners will bring into the workplace. Achieving this requires both effective Careers Information, Advice and Guidance, and broader awareness raising activities.

Skills Federation have called for a new careers strategy to set the direction and purpose of career development for young people and adults. A strategy exploring career development's potential to help address broader economic and social issues and connect individuals and industry which would:

- Widen perspectives, ensuring the skills for the future and supporting levelling-up.
- Remove fragmentation in the English system and promote an “all-age” approach to Careers Information Advice and Guidance.
- Engage with sector skills bodies and use the very rich information already available including existing industry careers sites/materials.
- Utilise the tools and training already available through organisations including the [Careers Development Institute](#) and the [Careers and Enterprise Company](#).

Lessons need to be learned from the roll-out of T Levels where awareness of young people, teaching staff and employers is still relatively low five years after delivery started.

We would recommend that there is a government led national campaign. This should cover the qualifications landscape overall including A Levels and T Levels in addition to V Levels and the Level 2 pathways. The campaign should effectively explain what each qualification is, what the main assessment methods are, how they form progression routes to work and further study, and where they can add value for employers.

The consultation document is clear that the primary audience for the new qualifications will be young people. This raises important questions about what vocational or technical qualifications will be available for adults to take. It is currently unclear what the adult offer will be and how this will be developed to be commercially viable. As Skills England analysis shows, over 70% of jobs in 2035 will be filled by people already in the labour market. This means that upskilling and reskilling will be critical, and government needs to consider carefully how adults will be supported to gain new skills within the new qualifications landscape.

Be part of a wider curriculum which supports young people to develop the wider skills they need to work

It is crucial that young people are supported to develop the transferable ‘essential employment skills’ that will be vital across the future labour market, particularly in growing occupations. [Work](#) carried out by NFER funded by the Nuffield Foundation identifies six essential employability skills: communication, collaboration, problem solving and decision making, organising, planning and prioritising work, creative thinking and information literacy. In addition, sector skills bodies report that employers value resilience, critical thinking skills, entrepreneurship, and understanding appropriate workplace behaviours. We support the recommendation in the NFER/Nuffield report for development of a common skills framework potentially utilising existing products, such as the [Skills Builder Universal Framework](#).

Work carried out by [Youth Employment UK](#) is concerning because it highlights that only 49% of young people in secondary school think they understand the skills employers are looking for. Contact with employers, particularly more in-depth interactions such as work experience, can support young people to understand the importance of these key skills and how they are integral to job roles. It also provides the opportunities for young people to develop more knowledge of how to operate in a workplace (e.g. about tax, national insurance and payslips) and can help dispel myths about what’s needed to enter careers in specific sectors.