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Desperate measures: data and the reform of Level 3 qualifications Protect Student Choice campaign

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Executive summary

- Young people in England can currently choose between three types of Level 3 qualification at the age of 16: academic qualifications such as A levels, technical qualifications that lead to a specific occupation, and applied general qualifications such as BTECs that combine the development of practical skills with academic learning. The government plans to replace this model with a tworoute model of A levels and T levels (its new suite of technical qualifications), where most students pursue one of these qualifications. As a result, the majority of BTECs will be scrapped.
- This report scrutinises the data used by the government to justify this major reform. It contrasts how ministers describe the performance of students that take applied general qualifications (AGQs) with students that take T levels. The report also examines how realistic the government's plans are for T level growth and the implications of its plan to scrap the majority of BTECs.

Key findings

 Ministers are so desperate to boost the number of students taking T levels that they routinely (mis)use a range of measures to understate the performance of applied general qualifications and overstate the performance (and potential uptake) of T levels. Our analysis indicates that at least 155,000 young people - 13% of all sixth form students in England - could be left without a suitable study programme from 2026, given the planned reduction in AGQs and slow growth of T levels.

The performance of students that take AGQs

- The government regularly uses data in a partial and misleading way to criticise the performance of students that take AGQs. Data on old-style, pre-reform applied general qualifications delivered in the past, is used to criticise the post-reform, more rigorous AGQs that are delivered today.
- For example, the government uses a 2022 report from the Nuffield Foundation to justify its central claim that "Current applied general qualifications produce very mixed outcomes," ignoring both the many positive findings in the report and the plea from its authors that "It is important to note that the effects of the reformed BTECs are not yet properly assessable."
- AGQs were reformed and approved for first teaching between 2016 and 2020, mirroring the process of reducing coursework and increasing exam assessment that A levels underwent between 2015 and 2018. Where data on post-reform AGQs is available, the government uses it in a highly selective way. For example:
 - Qualifications like the BTEC Foundation Diploma in Health and Social Care have been criticised by ministers because *"less than 5%"* of students progress to higher education. However, 64% of students studying this qualification progress to employment and 24% to further education.
 - Qualifications like the BTEC Extended Certificate in Engineering have been criticised by ministers because *"less than 20%"* of students progress to employment without further study. However, **50%** of students studying this qualification progress to employment *with* further study, and **23%** to higher education or further education.
- Positive data and research on the performance of AGQs is routinely ignored, as is the vital role these qualifications play in ensuring that students (particularly those with lower levels of prior attainment) remain in sixth form education and achieve a Level 3 qualification.

The performance of students that take T levels

• By contrast, the government routinely overstates the performance of T levels, describing them as *"gold standard"* qualifications that offer *"the best progression for students"*. But the first cohort of 1,029 T level students only completed their studies in 2022; detailed performance data for T

levels will not be available until 2025 and progression data not until 2027 at the earliest. There is simply no data to support the claim that T levels offer *"the best progression for students".*

- The government is very reluctant to publish any meaningful performance data on T levels. While detailed performance data is published for AGQs (see Annex 2), the government only publishes a pass rate and grade breakdown for T levels, and has refused to provide additional performance data in response to parliamentary questions and freedom of information requests.
- We do know that **90.5%** of T level students achieved a pass in 2023 (down from 92.2% in 2022) and **33%** of the 5,210 students that started the course did not complete it (up from 17.7% in 2022). Apparently untroubled by one third of students not completing their qualification, ministers took to social media to describe the *"great improvements"* in this second year of T level results.
- In a letter to *The Times* after results day (which the Department for Education attempted to rebrand as 'A level and T level results day') DfE minister Robert Halfon described this level of non-completion as *"typical for vocational routes"*. But the latest government data shows that just 8% of AGQ students and 9% of non-T level technical students failed to complete their course.
- This disconnect between rhetoric and reality is a recurring theme. The T level transition
 programme (a one year course of additional study time and preparation) is described as a *"highquality pathway onto T levels"* despite just 14% of students in the first cohort actually progressing
 to a T level. The government claims that progression data for the second cohort of students that
 started the T level transition programme in September 2021 is still not available.

The plan for T level growth and implications of scrapping BTECs

- Even if the plan to replace most AGQs with T levels was the right one, the proposed timescale is wildly unrealistic. In 2022/23, **281,260** students were studying at least one Level 3 AGQ, and **15,410** were studying a T level. The 2024/25 academic year will be the last year that students will be able to enrol on some AGQs. Our analysis indicates that:
 - AGQ numbers will fall rapidly and significantly: 191,257 AGQ students are studying qualifications that the government has already deemed to be ineligible for reapproval and will scrap by 2026. The remaining 90,003 are studying qualifications that the government will consider reapproving and may be available in the future (see Chart 2).
 - T level numbers will increase slowly and gradually. We believe linear growth in T level numbers is the most likely (but still optimistic) trend, which would lead to 51,482 T level enrolments by 2026 (see Chart 1).
- This dramatic reduction in the number of AGQs and slow growth of T levels will create a significant gap in the qualifications landscape. Our analysis indicates that at least **155,185** students are currently enrolled on an AGQ that will be scrapped by September 2026 *and* will not be able to enrol on a T level if growth follows our linear projection of 51,482 enrolments. These young people could be left without a suitable study programme from 2026.
- Ministers believe that T levels will "gain traction" when "competing qualifications" like BTECs have been removed. But scrapping BTECs to drive up T level numbers is a high risk strategy that is not supported by evidence. A range of design features (e.g. the requirement to complete a 45 day work placement) and high entry criteria (often as high or in some cases higher than for A levels) suggest that T levels are not the mass-market replacement for BTECs the government would like them to be. Many schools and colleges predict that scrapping BTECs is actually more likely to drive up A level numbers, particularly given that awareness of T levels remains low.
- In the absence of any official modelling on the routes that students might take after most AGQs have been scrapped, ministers have no sense of how many students might be left without a suitable study programme once their reforms have been fully implemented in 2026. Our analysis is an attempt to fill that void.

• Chart 1 plots four T level student number growth projections. Funding was made available in the 2021 spending review for *"up to 100,000 T level students"* by 2024/25. We see that achieving 100,000 T level students by 2024 would involve near-exponential growth, which is not consistent with enrolment patterns to date. The linear projection assumes a steady level of increase in numbers based on the three years of student numbers we have data for and projects 51,482 T level students in 2026.

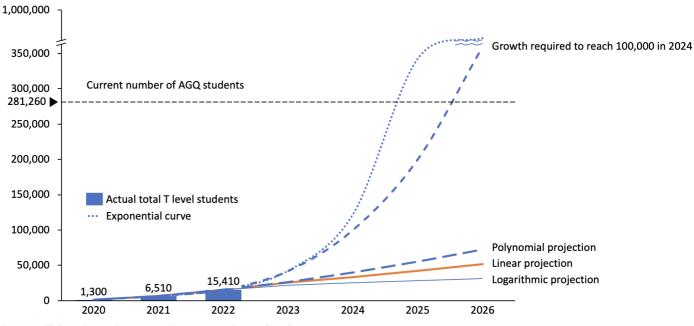


Chart 1: T level student number growth projections

Chart 2 illustrates the gap that will be left in the qualifications landscape as a result of the
government's plan and the impact this will have on students. At least 155,185 young people are
currently enrolled on an AGQ that will have been scrapped by September 2026 and will not be
able to enrol on a T level if growth follows our linear projection. This is almost certainly a
significant underestimate, as we have assumed that all AGQs eligible for reapproval will
successfully navigate the reapproval process, which in practice is extremely unlikely.

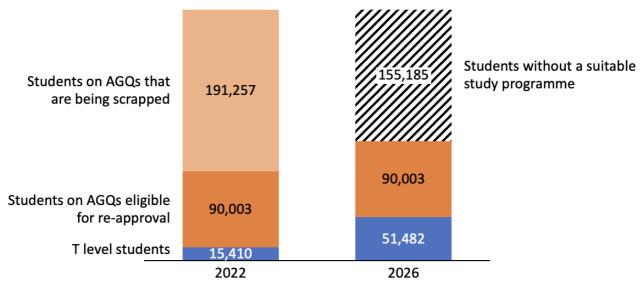


Chart 2: AGQ students that could be left without a suitable study programme in 2026

Commentary and recommendations

- The government hopes that scrapping the majority of applied general qualifications will increase
 the number of students taking T levels. It has become so desperate to achieve this *output*(increasing T level enrolments) that it has lost sight of the much more important *outcome*(ensuring all students are pursuing high quality qualifications that lead to positive destinations).
- This has not only led the government to regularly misuse data, but also to routinely ignore any concerns that are raised about the plan to scrap BTECs. Recent examples include a letter to ministers from 360 school and college leaders, a petition signed by 108,000 members of the public, joint letters from cross-party groups of parliamentarians, and joint letters from education and employer bodies. In addition:
 - The DfE's own equalities impact assessment concluded that disadvantaged young people are amongst those with the most to lose from the government's plan: "those from SEND backgrounds, Asian ethnic groups, disadvantaged backgrounds, and males [are] disproportionately likely to be affected."
 - The government's Infrastructure and Projects Authority (which monitors and supports the delivery of major projects) recently gave the T level programme a 'red' rating, which means that "Successful delivery of the project appears to be unachievable."
 - In April, the Education Select Committee published a highly critical report on the government's plan, with Committee Chair Robin Walker MP commenting that "the planned withdrawal of AGQs will constrict student choice and could deepen the skills shortages that these reforms are meant to fix..."
 - In July, the Committee issued a withering riposte to the Department for Education's response to its report: "The Government's response to our detailed and strongly evidenced recommendations was disappointing and gives the impression of prioritising saving face over ensuring its reforms are carried out in the interests of young people."
 - In the same month, Ofsted published its review of T levels and concluded: "there remains considerable work to do to improve the quality and effectiveness of T Level courses and the TLTP, to make sure that they...can be offered at scale," and recommended that DfE should "carefully consider the implications and impact of the planned withdrawal of funding for other similar courses to ensure that students are not disadvantaged."
- T levels are a welcome addition to the qualifications landscape and a genuine alternative to many of the technical qualifications that are currently available to young people. But it is reckless to press ahead with the plan to scrap AGQs when there is no evidence to suggest that T levels are yet a 'gold standard' replacement or can be offered at scale.
- Routinely using data in a partial and misleading way while ignoring concerns and evidence from a range of organisations inside and outside of government is a dangerous strategy. Ultimately, it will be young people that pay the price. There is a real risk that at least 155,000 students will be left without a suitable study programme from 2026; this in turn will stymie progression to higher education and employment and widen the skills gap faced by employers.
- As things stand, detailed performance data on T levels will only be published *after* the government's plan to scrap most AGQs has been implemented. The government should wait for detailed, comparable data on T levels to be published (including on long term outcomes like destinations, as well as breakdowns of performance by socio-economic status, ethnicity, and SEND) before implementing this major and potential irreversible reform of Level 3 qualifications.
- More broadly, the government should pause and review the implementation of its reforms and adopt an evidence-based approach to policymaking in this area. Failing to do so will be disastrous for young people, social mobility and the economy.

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Main report

This report scrutinises the data that the government uses to justify its reform of Level 3 qualifications and how this data is used to describe the performance of applied general qualifications (AGQs) and T levels. The report also explores how realistic the government's plans are for T level growth and the implications of scrapping the majority of AGQs.

Background

- Young people in England can currently choose between three types of Level 3 qualification at the age of 16: academic qualifications such as A levels, technical qualifications that lead to a specific occupation, and applied general qualifications such as BTECs that combine the development of practical skills with academic learning.
- The government <u>plans</u> to replace this three-route model with a two-route model of A levels and T levels (a new suite of technical qualifications), where *"most"* young people pursue one of these qualifications at the age of 16. As a result, funding for the majority of applied general qualifications will be removed.
- 1. The performance of students that take AGQs
- In making the case for scrapping the majority of AGQs, the government <u>describes</u> the need to
 rationalise the *"ridiculously large number"* of qualifications that leave students with a *"bewildering
 choice of which is right for them"*. But <u>only 134</u> of the 5,200 qualifications in the scope of the
 government's plans are Level 3 AGQs. These qualifications are available in around 40 subjects,
 with colleges and schools offering a fraction of this number.
- This small group of qualifications is also extremely popular 281,260 16 to 18 year olds were studying a Level 3 AGQ in 2022/23 according to data provided to the Protect Student Choice campaign in response to a freedom of information request.
- The government regularly uses data in a partial and misleading way to criticise the performance of AGQs. A recent example can be found in the <u>government's response</u> to the Education Select Committee's <u>report</u> on the future of post-16 qualifications. The response claims that "Current Applied General Qualifications (AGQs) produce very mixed outcomes, and those outcomes are poorer compared to students taking A Levels, even after controlling for differences in background characteristics."
- A similar claim was made by skills minister Robert Halfon in a <u>speech</u> to the Sixth Form Colleges Association in June 2023 and schools minister Baroness Barran in <u>response</u> to concerns raised by peers in the House of Lords in July 2023.
- The government uses a 2022 <u>report</u> from the Nuffield Foundation to support this claim. The Nuffield study is the only published research that controls for background characteristics such as prior attainment when comparing the outcomes of students taking A levels and AGQs. But the research is based on old-style, pre-reform applied general qualifications, not *"current"* AGQs.
- While the report's authors emphasise that *"It is important to note that the effects of the reformed BTECs are not yet properly assessable,"* the government makes no distinction between unreformed (QCF) and reformed (RQF) qualifications. AGQs were reformed and approved for first teaching between 2016 and 2020, mirroring the process of reducing coursework and increasing exam assessment that A levels underwent between 2015 and 2018.
- However, research and data on unreformed AGQs is regularly used by the government to criticise
 reformed AGQs. This matters, because it means that ministers are selectively using performance
 data on (older, less rigorous) qualifications that were delivered in the past, rather than
 qualifications that are being delivered now, to determine what qualifications can be delivered in
 the future.
- It is also worth noting that the anti-AGQ rhetoric from DfE ministers is at odds with guidance produced by their own Department. In April 2023 DfE <u>guidance</u> described reformed AGQs as *"high quality"* qualifications – a necessary requirement for inclusion in government performance tables.

Progression to higher education

- Positive findings on the performance of unreformed AGQs are routinely ignored by the government. For example, the same Nuffield report found that a quarter of students enter university with BTEC qualifications, and that they are far likelier to be from disadvantaged backgrounds. The vast majority of students were found to complete their studies successfully, with 60% graduating with at least a 2:1.
- The report's authors conclude that "These are considerable successes for these students, who without the availability of BTECs might not had the opportunity to attend university at all." (this chimes with <u>research</u> from the Social Market Foundation, which found that 44% of white workingclass students that enter university studied at least one BTEC and 37% of all black students entered with only BTEC qualifications).
- The government is silent on the <u>concerns</u> raised by the report's authors about the plan to scrap most BTECs: "we support the existence of routes into higher education that students from nontraditional backgrounds successfully use. We therefore have concerns about recently published Department for Education proposals to reduce significantly the number of Level 3 BTEC qualifications that it will fund."
- The Department's response to the Education Select Committee's report also claims that "The most recent <u>progression data</u> from 2018–19 shows that numerous AGQs had less than 5% progression to HE for courses in Engineering, Business, Media and Health & Social Care."
- This is both untrue and misleading. Untrue, in that there are no reformed AGQs in engineering or media that fit this description. Misleading, in that there are only two reformed AGQs with a progression rate to higher education lower than 5%, but their progression rates to other positive destinations are high:
 - The BTEC Foundation Diploma in Health and Social Care: Although only 4% of students progressed to higher education, 64% entered the workforce (16% went into work without further study, and 48% into work with further study such as an apprenticeship) and 24% went into further education. Only 9% of students did not have a sustained work or education destination a better rate than the Eduqas A level in Biology, where 10% of students were not in work or education.
 - The BTEC Foundation Diploma in Business: Although only 3% of students progressed to higher education, 62% entered the workforce (13% went into work without further study and 49% into work with further study) and 29% went into further education. Just 6% of students did not have a sustained work or education destination. Only 15 of the 144 A level qualifications in the same dataset have better rates of sustained destinations.
- In January 2023, the government <u>published</u> a list of subjects that it was prepared to approve qualifications in from 2025. When this list is <u>mapped</u> against the 134 applied general qualifications that are currently available to young people, 74 will not be funded in the future as they have been deemed ineligible for reapproval.
- The government's response to the Education Select Committee is clear that "qualifications funded as alternative academic qualifications in future will need to demonstrate a clear and direct link to Higher Education." However, the AGQs the government has deemed ineligible for reapproval actually have a *better* progression rate to HE (44%) than those it has deemed eligible (40%).
- These figures are based on the Department for Education's <u>destinations data</u> for students that completed their studies in 2019. Although limited in scale, it is the only published progression data for students that have studied reformed AGQs. However, our internal analysis of the destinations of students that completed their studies in SFCA member institutions in 2022 found that many AGQs have higher rates of progression to HE than A levels in similar subjects.
- For example, the BTEC Extended Diploma in Applied Science (which is ineligible for re-approval) was completed by 1,947 students in SFCA member institutions in 2022. Of these, 65% progressed to HE, compared to 61% of students that completed A level Biology. Most also went

on to study in a related field - 69% of Applied Science students studied medicine, subjects allied to medicine, or biological sciences at university. The equivalent figure for A level Biology is 59%.

• In summary, ministers have not only made claims about the HE progression rates of AGQs that are both untrue and misleading, but they have also managed to exclude the AGQs with the strongest track record in this area from being reapproved in the future.

Progression to employment

- The government's response to the Education Select Committee's report makes claims about progression rates to employment that are also untrue and misleading. For example, the report claims that "The data also shows a less than 20% progression rate into employment without further study for a range of AGQs, including those in Business Management, Engineering, Health and Social Care, ICT and Child Development. Some of these courses had over 4,000 enrolments."
- This claim is also based on DfE destinations data from 2018–19. However, there are no reformed AGQs in this dataset with over 4,000 enrolments, because most colleges and schools were delivering unreformed rather than reformed AGQs at that time. None of the AGQs in the dataset which had a less than 20% progression rate into employment without further study were in Child Development. And looking at the other subjects named, we find that:
 - The AGQ with the lowest progression rate into employment without further study in Engineering is the BTEC Extended Certificate. While only 15% of students went into employment without further study, 50% went into employment *with* further study, 15% into HE and 8% into FE. The **88%** sustained destination rate is the same as that for Edexcel Chemistry A level.
 - The AGQ with the lowest progression rate into employment without further study in ICT is the BTEC Foundation Diploma. While only 12% of students went into employment without further study, 23% went into employment *with* further study. A further 11% progressed into HE and 43% into FE - the same rate of progression to further study (54%) as the OCR A level in Latin and an overall sustained destination rate of **89%**.
 - The relevant qualifications in Health and Social Care and Business are the same Foundation Diplomas referenced in the section on HE progression.
- The selective use of employment progression data is particularly bizarre given the government is so keen to boost the number of students that pursue non-traditional HE routes. Students on the AGQs above are progressing in significant numbers to employment alongside further study (such as apprenticeships) or higher technical education at Level 4 or 5 - destinations that in other contexts the government is highly supportive of.
- To claim that some AGQs have a "20% progression rate into employment without further study" while ignoring the progression rate into employment with further study or to other positive destinations is simply misleading.

Remaining in 16-19 education

- The government also ignores the role that these qualifications play in helping students to actually secure a Level 3 qualification. Data from SFCA's Six Dimensions <u>research</u> highlights the vital role that BTECs play in ensuring students with lower levels of prior attainment *remain* in sixth form education, *achieve* a qualification and *progress* to positive destinations, including higher education.
- As recently as 2013, most students at sixth form colleges studied an A level-only programme. Those arriving at 16 with lower GCSE scores were much likelier to underperform and to drop out of education. Just 66% of students with mainly grade 4s completed their course – partly because 69% were on A level-only programmes. In response to this evidence, sixth form colleges remodelled their curriculum; five years later, only 17% of students with mainly grade 4s were on A level-only programmes and 79% completed their course. The judicious use of AGQs has seen drop out rates fall from 34% to 21% in sixth form colleges for these lower-qualified students.

- <u>Other data</u> from the Six Dimensions project shows that students with an average GCSE point score of 5.8 or below are more likely to remain in education through both years of sixth form on a mixed (AGQ and A level) programme than an A level-only programme. For students with prior attainment below 5.2, students are more likely to remain on an AGQ-only programme than a mixed or A level-only programme.
- Although the Six Dimensions analysis is based on a combination of reformed and unreformed qualifications, it highlights the powerful role that BTECs play in ensuring students *remain* in education (therefore reducing the social and economic cost of young people becoming NEET) and *achieve* a Level 3 qualification – which we know confers a range of benefits (including <u>earnings and employment benefits</u>) even if the student does not progress to higher education.

2. The performance of students that take T levels

- The government believes that scrapping the majority of AGQs will increase the number of students taking T levels. It has become so focused on this *output* (increasing the number of students taking T levels) that it has lost sight of the much more important *outcome* (ensuring all students are pursuing relevant, high-quality qualifications that lead to further study and/or skilled employment). As a result, DfE not only uses data to understate the performance of AGQs, but also to overstate the performance (and potential uptake) of T levels.
- Time and again, the plan to scrap the majority of AGQs is justified by the claim that T levels will be an improvement. T levels are <u>described</u> as "gold standard", while the negative impact on disadvantaged young people identified in DfE's own equalities impact assessment is dismissed: "We recognise that in some cases some students may be disadvantaged, however [sic] believe this will be outweighed by the benefits to students more broadly."
- The government's response to the select committee report also claims that "The Government is putting A levels and T Levels at the heart of most young people's study programmes because these qualifications offer the best progression for students." However, there is currently no data to support the claim that T levels offer "the best progression for students".
- The second cohort of T level students completed their studies in 2023 (in ten subjects; 20+ are planned in total) and the <u>only data on their performance</u> follows a different format to the much more comprehensive <u>performance data</u> produced for other qualifications like A levels and AGQs.
- We know that 3,448 students completed their T level in 2023, and that 90.5% passed. However, no average point score is provided to enable comparisons with A levels or AGQs. This data will not be made available until 2025. When it comes to progression, there is no data at all, and there will not be until 2027 at the earliest although DfE has made no commitment to publish destinations data for T levels in performance tables. The government's reliance on pass rates for T levels is surprising given this data is not published for A level students and is only published for AGQ students that study in FE-sector institutions.
- So while the government is fond of making 'apples and pears' comparisons between T levels and AGQs, in reality it is making 'apples and no apples' comparisons. The Department for Education describes T levels as *"gold standard"* qualifications and yet it is incredibly reluctant to publish any meaningful performance data on them.
- DfE publishes data on the average point score of AGQ students, and the percentage of students that progress to higher education, employment and more specific destinations such as employment with further study. In addition, it is possible to break down the average point score for AGQ students by ethnicity, free school meal eligibility, prior attainment and SEND status. None of this data is available for T levels (see Annex 2).
- The government's 'evidence-based' approach to Level 3 reform is based on a partial and selective analysis of data on qualifications that were delivered in the past (pre-reform AGQs) and qualifications that very few students have completed (T levels).
- The government has refused to publish more detailed performance data on T levels despite repeated parliamentary questions and freedom of information requests. For example, data on the performance of the T level transition programme was only made available in May 2022 following a

freedom of information request made by <u>FE Week</u>. Just 14% of the students that started this one year course in September 2020 went on to start a T level the following year.

- The government <u>claims</u> that data for students that started the course in September 2021 is still not available. A freedom of information request for this information was declined in April 2023. We also have little information about the background of students that study T levels. For example, ministers responded to a request to publish the average GCSE scores of students on Level 3 courses, but would <u>not include T level students</u>.
- We do know that **90.5%** of T level students achieved a pass in <u>2023</u> (down from 92.2% in <u>2022</u>) and **33%** of the 5,210 students that started the course did not complete it (up from 17.7% in 2022). Apparently untroubled by one third of students not completing their qualification, ministers took to social media to describe the *"great improvements"* in this second year of T level results.
- In a <u>letter</u> to *The Times* after results day (which the Department for Education had attempted to <u>rebrand</u> as 'A level and T level results day') DfE minister Robert Halfon described movement between courses as *"typical for vocational routes"*. But the <u>latest government data</u> shows that just **8%** of AGQ students, and **9%** of students studying existing (non-T level) technical courses, failed to complete their course.
- As things stand, detailed performance data on T levels will only be published *after* the government's plan to scrap most AGQs has been implemented. However, the government has refused <u>calls</u> to delay its plan, <u>claiming that</u> *"We understand that this is significant change, but we believe that the long-term benefits are what is needed* [sic]."
- 3. The plan for T level growth and the implications of scrapping BTECs
- In 2022/23, according to a freedom of information request, 281,260 students were studying at least one Level 3 applied general qualification. In the same year, 15,410 students were studying a <u>T level</u>. The 2024/25 academic year will be the last year that students will be able to enrol on the first tranche of AGQs to be scrapped, and 2025/26 for the second tranche. Even if the plan to replace most AGQs with T levels was the right one, the proposed timescale is wildly unrealistic.
- Funding was made available in the <u>2021 spending review</u> for *"up to 100,000 T level students"* by 2024/25, although the government has <u>denied</u> this constitutes a formal target. In the absence of a formal target, or any official modelling on what routes students will take after the government's reforms have been implemented, Chart 1 plots four T level student number growth projections.
- We see that achieving 100,000 T level students by 2024 would involve near-exponential growth, which is not consistent with enrolment patterns to date (and if T level growth *were* to follow an exponential trend, 81% of all sixth form students in England would be studying a T level by 2026/27).

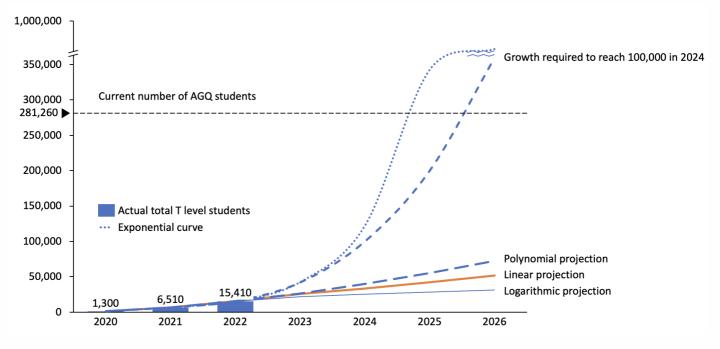


Chart 1: T level student number growth projections

- The polynomial projection takes into account the possibility of both increases and decreases in the rate of growth in future years, and projects **72,610** T level students in 2026 (by which time all AGQs that are not eligible for re-approval would have been scrapped). The linear projection assumes a steady level of increase in numbers based on the three years of student numbers we have data for and projects **51,482** T level students in 2026. The logarithmic projection assumes that an initially rapid rate of growth will stabilise to reach **39,218** students in 2026, with levels reaching a natural ceiling. This pattern is commonly seen when a population expands until a lack of available resources (such as placements for T level students) begins to constrain growth.
- We believe the linear trend is most likely, but still optimistic, given the well-publicised issues with
 increasing the take up of T levels. For example, the recent <u>report</u> from the Education Select
 Committee found that awareness of T levels was low: "the majority of young people hadn't heard
 of T Levels, while employers' interest in providing T Level work placements fell between 20192021." These concerns were echoed in Ofsted's recent <u>review</u> of T levels: "Finding suitable
 placements is a barrier to increasing the number of T-level places available in many providers."
- The government's Infrastructure and Projects Authority's annual <u>report</u> for 2022/23 rates the T level programme as 'red', signalling that "*Successful delivery of the project appears to be unachievable*," further underlining the challenge of increasing T level take up. T levels are the only DfE project to receive a red rating, which denotes that "*There are major issues...which at this stage do not appear to be manageable or resolvable*." This suggests that a logarithmic trend may be more likely.
- But assuming there is a linear increase in T level numbers and a steady state in overall 16-18 student numbers (in reality, demographics in this age group are increasing, exacerbating the problem of students with no AGQ pathway and no prospect of accessing a T level), this would lead to 51,482 T level students in 2026. This does not come close to filling the gap left by the mass withdrawal of applied general qualifications.
- How big will that gap be? Well, we know that at least <u>74 of the 134 AGQs</u> are definitely being scrapped because the government has deemed them to be ineligible for reapproval. Data provided to the Protect Student Choice campaign in response to a freedom of information request indicates that **68%** of AGQ enrolments nationally are on these 74 AGQs.

- Enrolment numbers are not an exact match for student numbers, because some students take more than one AGQ. There is also no national data that tells us the proportion of students studying programmes that are wholly, or just partly, made up of qualifications that are being scrapped. The lack of data transparency and absence of national modelling are hallmarks of the Level 3 review process.
- However, data collected through SFCA's Six Dimensions project tells us that 58% of AGQ *enrolments* in the sixth form college sector are on the 74 AGQs that are being scrapped, resulting in 64% of AGQ *students* in the sector studying at least one qualification that will not be available in 2026. AGQ students in the sixth form college sector exhibit relatively similar patterns of course choice to students nationally, as a 'midpoint' between schools and general further education colleges. As 68% of AGQ enrolments nationally are on the 74 AGQs that are being scrapped, we therefore conservatively estimate that 68% of AGQ students nationally (191,257 young people) are studying at least one qualification that will not be available in 2026. The remaining 32% (90,003 young people) are studying the 60 AGQs that the government has deemed to be eligible for reapproval and may therefore be available in the future.
- Chart 2 shows the result: of the **281,260** students currently studying at least one Level 3 applied general qualification, at least **155,185** young people are currently enrolled on an AGQ that will have been scrapped by September 2026 and will not be able to enrol on a T level if growth follows our linear projection.

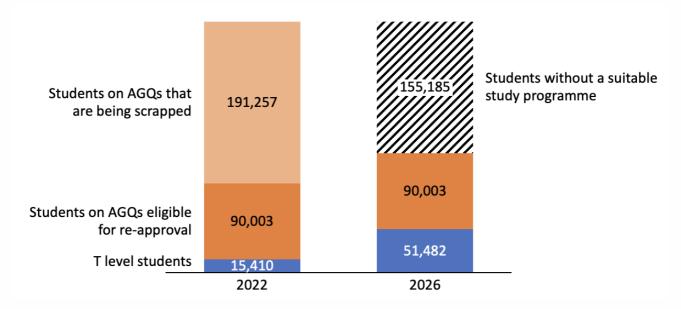


Chart 2: AGQ students that could be left without a suitable study programme in 2026

- Our analysis almost certainly significantly underestimates the number of students that could be left without a suitable study programme from 2026, because we have assumed that all 60 AGQs eligible for reapproval (those currently studied by 90,003 students) will successfully navigate the reapproval process. In practice, the government is unlikely to reapprove many, and <u>has been</u> <u>clear</u> that it only wants to see alternative qualifications (i.e. those that are not A levels or T levels) *"in a limited range of subjects".*
- The government's plan will have a significant national impact: the **155,185** students that could be left without a suitable study programme account for 13% of the 1,180,501 sixth form students in England in <u>full time education</u>).
- The impact will also be felt particularly keenly in subjects where the government plans to scrap almost all AGQs. This includes health and social care, which are <u>described</u> by the government in the context of higher education as "*strategically important subjects.*"

- Using the same assumptions as above, combined with a breakdown of 2022/23 course data obtained through a freedom of information request, Chart 3 shows that **45%** of students (25,500 16 to 18 year olds) currently enrolled on health and social care AGQs could be left without a suitable study programme as soon as 2025 (health and social care qualifications are included in the first tranche of AGQs to be defunded). This is in *less than two years' time* from the publication of this report, and a year earlier than the effects will be felt in most other sectors, where funding will be withdrawn in July 2026.
- The three BTECs shown are the most popular courses ineligible for re-approval. Note that the T level enrolments used below are particularly optimistic, as they include both health and science students; it is not possible to disaggregate those on a health rather than a science pathway.

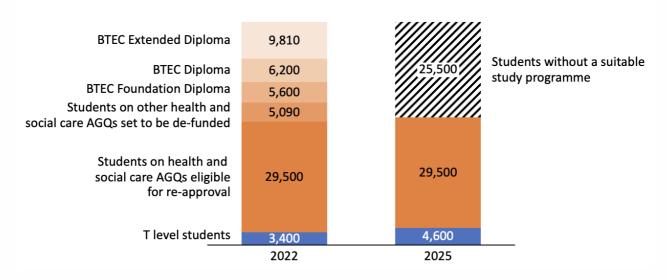


Chart 3: Health and social care AGQ students that could be left without a suitable study programme in 2025

- Using the latest DfE destinations data and assuming similar rates of progression to employment and education as for current AGQ students, this reduction of 25,500 students on health and social care pathways would result in 2,779 fewer students going straight into employment in health and social care each year. It would also see 2,818 fewer students going into further education in health, social sciences (where social care is categorised) and science, and 8,741 fewer students going into degrees in the same subjects. In the context of over 40,000 <u>nursing vacancies</u> and 165,000 <u>social care vacancies</u>, the government's plan has the potential to be enormously damaging to the health and social care workforce.
- More broadly, we know that the <u>average GCSE score</u> of students taking AGQs (4.90) is lower than the average GCSE score of students that take A levels (6.47). We also know from the Education Select Committee report that the entry requirements for T level courses are high, *"with some providers setting requirements that are at least as high as for an A Level program".*
- So even if T levels were more widely available, they would be out of reach for many young people, as they would not meet the entry requirements. The government <u>admits</u> that for "a small minority of students" a Level 3 qualification will be out of reach and their response is to develop "a higher quality offer at Level 2".
- Even if reducing the terminal qualification level of lower-achieving students was a desirable policy objective, the experience of the T level transition programme is not encouraging. As noted earlier, 14% of the students that started this one year course in September 2020 went on to start a T level the following year. The government claims that progression data for the second cohort of students that started the T level transition programme in September 2021 is still not available.

4. Commentary and recommendations

- The government hopes that scrapping the majority of applied general qualifications will increase
 the number of students taking T levels. It has become so desperate to achieve this *output*(increasing T level enrolments) that it has lost sight of the much more important *outcome*(ensuring all students are pursuing high quality qualifications that lead to positive destinations).
- This has led ministers to regularly use data in a partial and misleading way to understate the
 performance of applied general qualifications and overstate the performance (and potential
 uptake) of T levels.
- When concerns about the plan to scrap most BTECs are raised, they are routinely dismissed or ignored. Recent examples include a <u>letter to ministers</u> from 360 school and college leaders, a <u>petition</u> signed by 108,000 members of the public, <u>joint letters</u> from cross-party groups of parliamentarians, and <u>joint letters</u> from education and employer bodies. In addition:
 - The DfE's own equalities <u>impact assessment</u> concluded that disadvantaged young people are amongst those with the most to lose from the government's plan: "those from SEND backgrounds, Asian ethnic groups, disadvantaged backgrounds, and males [are] disproportionately likely to be affected."
 - The government's Infrastructure and Projects Authority (which monitors and supports the delivery of major projects) recently <u>gave the T level programme a 'red' rating</u>, which means that "Successful delivery of the project appears to be unachievable."
 - In April, the Education Select Committee published a <u>highly critical report</u> on the government's plan, with Committee Chair Robin Walker MP commenting that *"the planned withdrawal of AGQs will constrict student choice and could deepen the skills shortages that these reforms are meant to fix..."*
 - In July, the Committee issued a <u>withering riposte</u> to the Department for Education's response to its report: "The Government's response to our detailed and strongly evidenced recommendations was disappointing and gives the impression of prioritising saving face over ensuring its reforms are carried out in the interests of young people."
 - In the same month, Ofsted published its <u>review of T levels</u>, concluding: "there remains considerable work to do to improve the quality and effectiveness of T Level courses and the TLTP, to make sure that they...can be offered at scale," and recommended that DfE should "carefully consider the implications and impact of the planned withdrawal of funding for other similar courses to ensure that students are not disadvantaged."
- T levels are a welcome addition to the qualifications landscape and a genuine alternative to many of the technical qualifications that are currently available to young people. But it is reckless to press ahead with the plan to scrap AGQs when there is no evidence to suggest that T levels are yet a 'gold standard' replacement or can be offered at scale.
- Routinely using data in a partial and misleading way while ignoring concerns and evidence from a range of organisations inside and outside of government is a dangerous strategy. Ultimately, it will be young people that pay the price. There is a real risk that at least 155,000 students will not be able to access a course of study that meets their needs in the future. This in turn will stymie progression to higher education and employment and widen the skills gap faced by employers.
- As things stand, detailed performance data on T levels will only be published *after* the government's plan to scrap most AGQs has been implemented. The government should wait for detailed, comparable data on T levels to be published (including on long term outcomes like destinations, as well as breakdowns of performance by socio-economic status, ethnicity, and SEND) before implementing this major and potential irreversible reform of Level 3 qualifications.
- More broadly, the government should pause and review the implementation of its reforms and adopt an evidence-based approach to policymaking in this area. Failing to do so will be disastrous for young people, social mobility and the economy.

Annex 1: the availability of performance data by qualification type

	Performance data	Destinations data	Long-range outcomes data (e.g. degree outcomes and earnings)
Unreformed AGQs	Publicly available, comprehensive.	Publicly available, comprehensive.	Publicly available, comprehensive.
Reformed AGQs	Publicly available, comprehensive.	Publicly available and comprehensive for one cohort (2019 leavers).	Not available. Comprehensive data likely from 2025.
T levels	Publicly available for two cohorts (2022 and 2023 completers). Very limited. Comprehensive data likely from 2025.	Not available. Comprehensive data likely from 2027.	Not available. Comprehensive data likely from 2029.

Annex 2: published performance measures for T levels and AGQs (reformed and unreformed)

Measure	T levels	AGQs: 2022 performance tables unless indicated
Pass % (AGQ data taken from 2019 achievement rates <u>tables</u> which only include FE sector institutions. T level data taken from 2023 results day statistics)	90.5%	92.8%
Average point score	Not published	31.91
Average point score – disadvantaged students	Not published	29.97
Average point score - Any other ethnic group	Not published	30.58
Average point score - Asian or Asian British - Any other Asian background	Not published	31.64
Average point score - Asian or Asian British - Bangladeshi	Not published	31.95
Average point score - Asian or Asian British - Indian	Not published	33.23
Average point score - Asian or Asian British - Pakistani	Not published	31.38
Average point score - Black or Black British - Any other Black background	Not published	29.08
Average point score - Black or Black British - Black African	Not published	29.12
Average point score - Black or Black British - Black Caribbean	Not published	28.33
Average point score - Chinese	Not published	33.77
Average point score - Mixed Dual background - Any other Mixed background	Not published	30.50
Average point score - Mixed Dual background - White and Asian	Not published	31.99
Average point score - Mixed Dual background - White and Black African	Not published	29.81
Average point score - Mixed Dual background - White and Black Caribbean	Not published	30.60
Average point score - White - Any other White background	Not published	30.76
Average point score - White - Gypsy Roma	Not published	27.61
Average point score - White - Traveller of Irish Heritage	Not published	30.00
Average point score - White - White British	Not published	32.70
Average point score - White - White Irish	Not published	32.12
Average point score - Eligible for FSM	Not published	30.05
Average point score - English as additional language	Not published	30.96

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Average point score Female	Not published	33.23
Average point score - Female Average point score - Male	Not published	30.52
	Not published	25.52
Average point score - Priors 0 to < 4		
Average point score - Priors 4 to < 7	Not published	33.41
Average point score - Priors 7+	Not published	44.36
Average point score - EHC plans and statements of SEN-	Not published	20.42
Autistic spectrum disorder	•	28.43
Average point score - EHC plans and statements of SEN-	Not published	21.12
Hearing impairment		31.13
Average point score - EHC plans and statements of SEN-	Not published	26.97
Moderate learning difficulty	-	20.97
Average point score - EHC plans and statements of SEN- Multi-	Not published	20.42
sensory impairment	-	29.43
Average point score - EHC plans and statements of SEN- Other	Not published	27.02
difficulty		37.92
Average point score - EHC plans and statements of SEN-	Not published	24 70
Physical disability	•	31.78
Average point score - EHC plans and statements of SEN-	Not published	40.00
Profound and multiple learning difficulty	•	40.00
Average point score - EHC plans and statements of SEN-	Not published	
Severe learning difficulty		31.22
Average point score - EHC plans and statements of SEN-	Not published	00.05
Social, emotional and mental health		26.65
Average point score - EHC plans and statements of SEN-	Not published	
Specific learning difficulty		27.06
Average point score - EHC plans and statements of SEN-	Not published	
Speech, language and communication needs	riorpablicitoa	28.65
Average point score - EHC plans and statements of SEN- Vision	Not published	
impairment		31.19
Average point score - SEN support- Autistic spectrum disorder	Not published	29.67
Average point score - SEN support- Hearing impairment	Not published	31.75
Average point score - SEN support- Moderate learning difficulty	Not published	28.34
Average point score - SEN support- Multi-sensory impairment	Not published	35.76
Average point score - SEN support- Other difficulty	Not published	28.85
Average point score - SEN support- Physical disability	Not published	32.13
Average point score - SEN support- Profound and multiple	Not published	
learning difficulty	Not published	37.57
Average point score - SEN support- SEN support but no	Not publiched	
specialist assessment of type of need	Not published	27.54
Average point score - SEN support- Severe learning difficulty	Not published	27.62
Average point score - SEN support- Social, emotional and	Notoublished	
mental health	Not published	28.47
Average point score - SEN support- Specific learning difficulty	Not published	30.03
Average point score - SEN support- Speech, language and	•	
communication needs	Not published	27.92
Average point score - SEN support- Vision impairment	Not published	30.17
Average point score - Total EHC plans and statements of SEN	Not published	28.94
Average point score - Total SEN support	Not published	29.15
% progressing to employment only (from experimental		-
destinations statistics on 2019 leavers which only include FE	Not published	27%
sector institutions)		=. /•
% progressing to FE (source as above)	Not published	17%
		43%
% progressing to HE (source as above)	Not published	
% progressing to sustained work or education (source as above)	Not published	88%