

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

Executive Summary

The Greater London Authority (GLA) welcomes the opportunity to submit views on the review of post-16 qualifications at level 2 and below in England consultation. This paper sets out the GLA's response – on behalf of the Mayor of London – to the relevant questions set out in the consultation document.

The key points made in the GLA's response to the consultation are summarised below.

The Mayor supports a qualifications and skills system at level 2 and below that is focussed on progression

It is right that the focus of the review of post-16 qualifications at level 2 and below in England is on learning that supports progression for all those who take part. The GLA is in broad agreement with the progression routes laid out in the consultation although further consideration and more clarity is needed from Government in some areas.

The GLA must maintain the autonomy to determine local skills needs and fund courses and qualifications in line with these needs

The Mayor believes it is vital that London's skills offer is locally relevant. The GLA must be able to support London's skills system to collaborate and shape solutions that work for the local area, to ensure that skills provision is better integrated with other services; makes the most of the delegation of powers and funding to the Mayor; and reflects the needs of the capital's communities and economy. To respond to London's needs, the GLA must be able to fund qualifications that address skills gaps which may differ from national requirements.

This is particularly important given the numerous qualification routes proposed in this consultation. The Mayor supports the concerns that the Association of Colleges (AoC) have outlined in their response, namely that smaller further education colleges may not be able to run programmes in similar subjects with different pathways at the same time. It is therefore key that the Mayor is empowered to coordinate provision across the London region to ensure that learners have access to the most appropriate skills and pathways.

Wider social benefits of education at level 2 and below should be recognised

Education, particularly at level 2 and below, can build confidence and self-efficacy, helping to make it possible for people from all backgrounds to contribute positively to society. It can enable individuals to connect with other communities, improve their economic prospects, better support their families, and be more informed and active citizens. These benefits are valuable progression outcomes for people and should play a significant role in determining the funding of education at level 2 and below.

The Mayor would therefore encourage government to ensure further consideration of these outcomes as the skills system is reformed.

The Mayor supports the focus on outcomes but believes social outcomes should be included and their importance recognised and has made this clear in previous consultations, including the Department for Education's (DfE) consultation on reforms to further education funding and accountability. Social outcomes such as improved health and wellbeing, social integration and resilience are an essential part of the learner's journey to employment, in-work progression and further studies. The Mayor (and Mayoral Combined Authorities) should retain autonomy in setting the Skills Measure for London and other relevant outcome benchmarks to assess providers' performance in line with the local needs of learners and businesses. The Mayor has invested significantly in the creation of the GLA's London Learner Survey which monitors the wider benefits that learning provides – both social and economic. The survey is due to report for the first time in 2023 and will help to better demonstrate the impact of adult education.

Personal, social and employability qualifications consultation should have been included as part of the review of post-16 qualifications at level 2 and below in England.

It is disappointing that this consultation does not contain a full outline of the personal, social and employability (PSE) qualifications that will be funded. These qualifications are a key tenet of skills provision at level 2 and below.

PSE qualifications are a significant factor in supporting progression for learners by enabling them to live independently, improve their social and professional interactions and learn key skills to enter the workplace.

The absence of a full consultation on PSE qualifications at this stage makes it difficult to make an assessment as to whether the skills system will support the needs of London's businesses, providers and learners.

Greater devolution/delegation of AEB funding streams is needed

The Mayor needs more funding and powers to respond to the needs of London's businesses and Londoners appropriately. Traineeships, Skills Bootcamps and all National Skills Fund (NSF) elements of the new Skills Fund should be devolved to the Mayor to avoid additional complexity and bureaucracy for providers, and to ensure alignment of all elements of the new Skills Fund. Without this, providers in London will have Skills Fund allocations from both the ESFA (Education and Skills Funding Agency) and the Mayor, which invariably will be managed differently and create an unnecessary burden for providers.

The Mayor should also be delegated the skills element of the UK Shared Prosperity Fund (UKSPF) from 2023-24 as is the case in Wales, Scotland and Northern Ireland and be responsible for endorsing Local Skills Improvement Plans (LSIPs) in London.

Under the DfE funding and accountability reform for further education, consideration should be given to placing all 19+ adult education and skills at London-located providers under the Mayor's responsibility to simplify arrangements and support coherent delivery for employers; this would allow London residents and non-London residents studying at the same institution to be funded consistently. This approach would support the Government's ambitions to give local leaders the tools and powers they need to support Levelling Up.

The GLA's full consultation response continues below.

Chapter 1: Level 2 qualification groups proposed for funding

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

The Mayor agrees that level 2 qualifications that support progression to level 3 technical provision should be funded.

Many of these learners will be adults (19+), who are ineligible for T-levels. The consultation outlines that the level 2 qualifications will prepare those ineligible for T-levels for '*another programme that exists alongside T-levels*' and government should clarify what the alternative programmes will be for those ineligible for T-levels.

As this qualification route is designed to support learners into technical qualifications at level 3, the technical skills gained through these qualifications need to be aligned to employer need. While there may be some skills that are in demand across the country by employers, there are many skills needs that are specific to regions and localities. This local need should be determined by the GLA/ Mayor Combined Authorities (MCAs) who are best placed to understand their regional skills requirements. The GLA/MCAs must be able to fund qualifications that meet these needs, even if these qualifications do not align with national priorities.

6ii. Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120-240 GLH (Guided Learning Hours)?

120-240 GLH is the equivalent of 1 x GCSE. To progress to a diploma at level 3 the entry requirement would normally be 5 x GCSEs at Grade 4 or above. A single small-sized qualification would therefore not be sufficient to allow progression onto a level 3 qualification. If this qualification forms part of a transition into a technical qualification, for example the T-level transition programme or equivalent, this smaller qualification could be an important part of such a programme.

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

The Mayor agrees that occupational-entry qualifications leading to employment at level 2 should be funded. While many learners will wish to continue in education beyond a level 2, it is not realistic to think that all learners will wish to do so.

Learners undertaking occupational-entry qualifications leading to employment at level 2 in London are often from communities or have protected characteristics that are underrepresented in the labour market, mirroring some of the statistics in the government's own impact assessment. Adult learners at this level may also have been out of the labour market for some time and may require additional support to enter employment. It will therefore be key that providers are able to offer Personal, Social and Employment skills (PSE), alongside training to meet the needs of their learners.

Given that the proposals for PSE are not set out in the consultation, the GLA is unable to comment on whether this provision would be appropriate to meet the

needs of learners. It is key that any proposals recognise the varying needs of learners and attach appropriate funding for providers to meet PSE needs as well as any additional wraparound support required for their learners.

For this progression route to be successful for London's learners, the occupational-entry qualifications need to meet the skills needs of employers in London. The funding of additional qualifications for this route in London should therefore be determined by the GLA.

7ii. 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?

The GLA agrees that it is important that these qualifications should include broad route-specific content as well as the knowledge, skills and behaviours required to enter an occupation.

To meet the aim of an occupational-entry qualification, broad route-specific content should contain enough contextual understanding that employers and learners feel confident that the learner has the necessary knowledge to enter the workplace.

10. Do you agree that we should fund specialist qualifications at level 2? If you agree, are there any examples of qualifications that you think might fall into this group?

To support learners and employers to gain the skills they need, specialist qualifications at level 2 should be funded. Further details on proposed reforms should include clarification on the definition of '*skilled employment*.' If qualifications are to be funded at level 2 that build on a subset of a level 2 qualification, it will be important to ensure that these subsets are specific, skilled and that there is appropriate employer demand to support learners into employment in a related occupation.

Such specialist skills however may be exclusive to, or concentrated in, specific locations or regions. It is therefore vital that the GLA/ MCAs can determine local skills needs. This would include the GLA /MCAs having the ability to identify any additional qualifications that would be suitable for funding based on local skills needs.

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

Qualifications that develop cross-sectoral skills for young people at level 2 should be funded.

While these cross-sectoral skills qualifications can be taken by young people as part of the T-level Transition Programme, they will also need to be accessible for adult learners through an alternative programme of study, or as stand alone, funded qualifications for adults.

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

Qualifications that support progression to specialist level 3 academic qualifications should be funded.

Qualifications funded at level 2 need to support learners to enter education at the appropriate level, to support a positive educational experience and to progress to level 3 where possible and appropriate for the learner.

12ii. Do you agree that qualifications in this group should be small-medium sized, with a guideline size of 120-240 GLH?

120-240 GLH is the equivalent of 1 x GCSE. To progress to a diploma at level 3 the entry requirement would normally be 5 x GCSEs at Grade 4 or above. A single small-sized qualification would therefore not be sufficient to allow progression onto a level 3 academic qualification and should contain more GLH. Entry requirements for level 3 specialist academic qualification should allow learners to progress between level 2 and 3 specialist academic qualifications.

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

The Mayor supports the inclusion of performing arts qualifications and recognises that these are often specialist courses that enable progression and are recognised by specialist institutions in the field of performing arts. Culture and the night time economy are important for London and its economy. Prior to the pandemic, London's creative economy generated £58.4 billion for the economy and accounted for 1 in 6 jobs in London. This sector has however, been severely impacted by the COVID-19 pandemic. It is projected that as a result of the pandemic £16.5bn and 152,500 jobs have been lost.

The Mayor also welcomes the acknowledgement that maintaining availability of these courses supports a broad and balanced education by supporting creative skills and widening horizons. Learners may excel in these subject areas where they struggle on compulsory level 2 subjects during schooling, and this enables growth, confidence and progression routes for those learners.

However, the same is true of many other creative qualifications, from visual arts to screen industry courses, which also have comparable specialist institutions to the performing arts sector and similarly expand learner horizons. Film schools and conservatoires are as much a part of the UK's swiftly growing creative job market as performing arts institutions. So, rather than single out one sector, a broader approach that reads across to other creative industries would be more appropriate. The screen industries have huge skills shortages that represent substantial employment opportunities in the UK, with three quarters of the UK film industry based in London, and should not be overlooked.

The fact that proposals include continuing to fund level 2 performing arts graded exams in their current form, despite these qualifications sitting outside of the proposed qualification system, is welcome. It may be that there are some qualifications which do not fit into a progression focussed system but have significant value to the learner or wider society and these qualifications should also be funded. It is important that all qualifications that will have funding removed as a result of a reworked skills system at level 2 and below should be reviewed and impact assessed by government, to ensure that where there is additional value to the learner or society that these qualifications can remain funded.

The power to recognise additional qualifications of value should be available to the GLA and MCAs to ensure that qualifications that are of value to local communities and economies can be funded.

13ii. Do you agree that we should continue to fund level 2 Higher Project Qualifications in their current form?

Higher Project Qualifications are not widely taken up across the UK. Analysis shows that in 2015 there were only 5,500 completions of a level 2 Higher Project Qualification in the UK. There is low take up of these qualifications in London and we do not currently fund higher project qualifications for adult learners aged 19 plus through London's Adult Education Budget (AEB).

While these qualifications offer key skills to learners, qualifications such as A levels and BTECs offer the opportunity for skills such as research and writing which are integrated into the delivery of these qualifications in addition to other skills and knowledge.

The Mayor therefore does not believe that level 2 Higher Project Qualifications should be funded in their current form.

Chapter 2: Level 1 and entry level qualification groups proposed for funding

14i 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?

It is important that level 1 pre-technical qualifications which focus on progression to level 2 and introduce the relevant occupational route are funded.

While these qualifications should focus on progression to level 2 and introduce learners to the relevant occupational route it is important to recognise that these qualifications may serve as a (re)introduction to education for many learners.

It is therefore important that these qualifications give learners specific skills and support progression as well as giving learners access to the wider benefits of education at this level. For example, a level 1 Award in Preparing to Work in Schools could lead to level 2 Award in Support Work in Schools but will also build confidence in learners that they are able to enter new workplaces and begin a new career.

There is also a benefit for learners to build occupational skills at this level. While many learners will progress to level 2 qualifications, the level 1 Award in Workers' Rights and Labour Exploitation has been developed to raise awareness of the basic employment rights provided by UK law. Learners will gain an understanding of the job application process, how to spot bogus job ads and gain the tools to spot signs of exploitation. This would support learners to enter the labour market when appropriate for them. Courses such as those outlined above may not fit into an occupational route and may not be funded but provide clear benefits to the learner in the workplace.

The consultation sets out changes that include removing funding for *'qualifications at these levels that are too narrowly focused only on certain skills, e.g., plumbing or bricklaying, and do not provide a broad enough introduction to the construction route to support progression to level 2'*. While the Mayor supports a focus on progression, we echo concerns raised by the Association of Adult Education and Learning Providers (AELP) that courses that provide learners with occupational focussed skills will be lost, particularly when these skills are in demand from employers and provide learners with skills that may support their entry into the workplace.

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

Level 1 qualifications that act as a pre-requisite to employment should be funded.

If these qualifications were not funded, learners would either have to secure employment with employers who are willing to hire new starters without the necessary pre-requisite qualifications and then fund the new starter through a qualification, or alternatively self-fund through these qualifications.

This cost could deter employers from hiring new starters without these qualifications and learners who cannot afford to self-fund through these qualifications may be shut out of these occupations.

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

For question 16i, please see the answer to question 13.

16ii Do you agree that we should continue to fund level 1 Foundation Project Qualifications in their current form?

There is low take up of Foundation Project Qualifications (FPQs) in London and we do not currently fund FPQs for adult learners aged 19 plus through London's AEB.

While these qualifications offer key skills to learners, qualifications such as GCSEs and many level 1 qualifications offer the opportunity for skills such as research and writing, which are integrated into the delivery of these qualifications, in addition to other skills and knowledge.

The Mayor therefore does not believe that level 1 FPQs should be funded in their current form.

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

Entry level 3 pre-technical qualifications that support progression to level 1 study should be funded. These qualifications will allow learners to enter education at a level suitable for them and may support learners to progress to level 1 study.

Some learners will not seek to progress into level 1 qualifications but will experience significant social benefits including greater connection and confidence.

The lack of recognition of these wider benefits throughout these proposals is disappointing and runs counter to the Mayor's view that education enables Londoners to lead happier, healthier, more integrated lives. To demonstrate the impact of adult education, the GLA's London Learner Survey monitors the wider benefits that learning provides – both social and economic. The survey is due to report for the first time in 2023.

Given the social and community benefits of education at this level, these outcomes should be a significant factor when determining what qualifications should be funded and how success for learners taking these qualifications is measured.

The Mayor would welcome further consideration of these outcomes as the skills system is reformed.

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

The Mayor supports the inclusion of performing arts qualifications and recognises that these are often specialist courses that enable progression and are recognised by specialist institutions in the field of performing arts. He also welcomes the acknowledgement that maintaining availability of these courses supports a broad and balanced education by supporting creative skills and widening horizons.

Learners who are participating in entry level graded qualifications in performing arts may be looking to progress but may also access these qualifications after struggling during compulsory education, to build confidence, enabling them to re-enter education through qualification routes that seem more accessible to them.

Chapter 3 – Supporting Adults

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?

The design and delivery principles in paragraphs 150 to 155 will ensure level 2 qualifications are more accessible to adults. The ability for adults to undertake qualifications in a way that is more compatible with work and other responsibilities

through modular learning will make education more accessible. A modular approach may mean that providers need to provide additional support to learners to ensure that they maintain retention between modules. This is particularly the case where learners have had to take time away from education in between modules to manage their additional responsibilities. This should be considered when determining the funding needed to support a reformed skills system at level 2 and below.

The recognition of prior learning in paragraph 154 is welcome, ensuring learners do not have to repeat learning where they have the relevant knowledge. To make sure learners are entering education at the right level, it may be beneficial for some learners to undertake learning that could be accounted for in prior learning or relevant experience, particularly where this will develop learner confidence or other wider outcomes associated with learning at this level.

When considering the appropriate assessment of occupational entry competence, it is appropriate that consideration should be given to how modular skills come together to form a complete qualification. The commitment to engage with relevant stakeholders, including awarding organisations, providers and employers is welcome. This engagement should also include learners and their representatives where appropriate, to make sure that assessment meets the needs of providers, employers and learners.

20 Do you agree that we should fund the following level 2 qualification groups for adult learners: Group 1: Qualifications supporting progression to level 3 technical study Group 2: Occupational-entry qualifications Group 4: Specialist qualifications Group 5: Qualifications supporting cross-sectoral skills Group 7: Qualifications supporting progression to level 3 academic study

The Mayor supports the funding of the above qualification groups for adult learners, and the qualification groups laid out within the consultation align broadly with the Mayor's ambitions for adult education and a system that supports and strengthens progression at level 2 and below.

While the Mayor is broadly supportive of the proposals outlined, it is concerning that the personal and community benefits of education at this level are not recognised in these proposals. The benefits of education at this level can be transformative for individuals and communities and should play a greater role in determining what qualifications are funded.

London faces a set of challenges which are different to the rest of the UK. London suffers from high levels of structural inequality, exacerbated by Covid-19; and in London's highly skilled labour market, those without higher level skills (level 3 and above) can be trapped in low-paid work. In 2020, over a fifth of the working age population in London had not obtained a level 3 qualification, equivalent to at least 1.3 million Londoners.

It is vital that London is able to meet these challenges head on, with an approach that recognises the specific needs of the region. Regional need should be

determined by the GLA (or relevant MCA) to establish how these needs can be met through qualifications at level 2 and below.

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

The Mayor agrees that occupational focused qualifications at level 2 should be funded for adults.

To ensure that these qualifications are successful, they will need to be promoted to employers so that their technical content is recognised.

21ii Do you agree that these qualifications should be medium sized, with a guideline size of 200-540 GLH?

The Mayor agrees that these qualifications should be medium sized.

23 Do you agree that we should fund the following qualification groups at level 1 for adult learners: Group 9: Level 1 pre-technical qualifications supporting progression to level 2 study Group 10: Level 1 qualifications serving as a prerequisite to employment Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications

As outlined in question 20 the Mayor is broadly supportive of the skills system outlined through this consultation and with an approach that focuses on progression to further skills at level 1.

As previously stated however, it is very concerning that the wider benefits of education are not considered in the proposals for determining funding of qualifications at this level.

It is vital that London has the ability to determine how best education and qualifications at level 2 and below can be used within this framework to address local skills needs.

24 Do you agree that we should fund Entry level performing arts graded qualifications

As outlined in question 13i, the Mayor supports the funding of entry level performing arts graded qualifications, and the recognition that particular qualifications and skills may fall outside the progression routes laid out in the consultation.

Qualifications at this level should be reviewed, considering the wider benefits that may be obtained as a result of the learner undertaking the qualification, to ensure that other courses that may provide learners with these benefits are not lost.

Chapter 4 - Level 2 and below English, maths and ESOL qualifications (non FSQ/GCSE)

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

Funding should not be removed at level 2 for non-GCSE/FSQ English qualifications.

The Mayor understands that removing funding at level 2 for non-GCSE/FSQ English qualifications could make it simpler for employers to understand the qualifications of potential employees. It would also be consistent with approaches taken in relation to apprenticeships and the proposals for access to the student loan system for higher education.

However, when supporting learners who do not have a level 2 English qualification into education at level 2, repeating the same qualification or curriculum they did not achieve during formal qualification is not the most effective way of encouraging engagement in English skills. Research commissioned by the GLA¹ into English and maths provision in London found that learners who struggle to find learning provision accessible are more likely to engage in literacy provision that uses approaches less reminiscent of the school curriculum.

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

The Mayor does not agree that funding should be removed at level 2 for non-GCSE/FSQ maths qualifications.

As with similar proposed changes to English qualifications at level 2, although proposed changes may make understanding level 2 maths qualifications simpler for employers and would create a consistent approach across levels and forms of education, this is not necessarily in the best interests of the learner.

As outlined in question 25i, GLA research shows that learners who found learning at school inaccessible are more likely to engage in maths provision that uses approaches less reminiscent of the school curriculum.

While consistency in approach is important, the Mayor's priority is ensuring that learners have maths skills and knowledge at level 2, and our evidence suggests that limiting the type of qualifications available for learners may deter potential learners.

This priority of learners gaining maths skills regardless of the type of qualification gained (if any), is mirrored by the government's 'Multiply' programme. 'Multiply' recognises that for learners who do not have maths qualifications at level 2, a variety of approaches may be required for them to re-engage with maths and numeracy skills. The Mayor believes that this approach is correct, and that priority should be given to ensuring that learners gain level 2 maths and numeracy skills regardless of the qualification type achieved.

¹ Learning and Work Institute, *Effective practice in English and maths for adult learners in London*, to be published 2022

26i Do you agree we should continue to fund level 1 and entry level English qualifications for learners who cannot access FSQs/ GCSEs?

It is important that learners who are not able to access level 2 English qualifications are able to take up level 1 and entry level English qualifications and these qualifications should continue to be funded.

Undertaking English qualifications at this level may be particularly useful for learners who have low levels of English skills and would therefore not be able to access FSQ/GCSE qualifications. Enabling learners to undertake level 1 English qualifications will aid progression to level 2 in learners who would not otherwise be able to access FSQ/GCSE qualifications and build confidence in the learner.

26ii Do you agree that we should continue to fund level 1 and entry level maths qualifications for learners who cannot access FSQs/GCSEs?

Level 1 entry level maths qualifications should continue to be funded for learners who cannot access FSQ/GCSEs. It is important that learners who are not able to access level 2 maths due to a lack of level 1 maths skills, are able to access level 1 entry level maths qualifications. Ensuring learners can access, for example, entry level personal finance qualifications can build their confidence to enable further progression into learning. Learning at this level can also have other individual and community benefits.

As previously stated, the government's 'Multiply' programme recognises the benefits of maths qualifications below level 2 in supporting learners to feel confident with numeracy and its applications in both their professional and personal lives.

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

[See response to question 27ii.](#)

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

Developing all non-GCSE/FSQ qualifications against the National Standards for Adult Literacy and Numeracy would ensure that all learners achieving these qualifications would have a similar level of skills and knowledge.

Standardising all non-GCSE/FSQ qualifications could mean however, that learners who struggled with these qualifications in the past have little option when re-entering education other than retaking similar qualifications.

It would be important to ensure that developing non-GCSE/FSQ English and maths qualifications against the National Standards for Adult Literacy and Numeracy should not result in a convergence or uniformity of qualifications. As referenced throughout this consultation response, learners can be deterred by the sense of undertaking a school curriculum.

It is not, therefore, desirable that all non-GSCE/FSQ qualifications in maths be developed against the National Standards for Adult Literacy and Numeracy.

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

The National Standards for Adult Literacy and Numeracy would need updating if the proposals laid out in this consultation were to be implemented. Government would need to ensure that national standards reflect relevant skills. This could reflect, for example, current use of digital tools within these areas.

29 Do you agree that we should continue to fund ESOL qualifications at each of the following levels: (i) Level 2 (ii) Level 1 (iii) Entry level (including sub levels 1,2 and 3)

The Mayor agrees that ESOL should continue to be funded at: (i) Level 2, (ii) Level 1 and (iii) Entry level (including sub levels 1,2 and 3). The majority of ESOL provision delivered across the UK is in London and provision at all levels is vital. In the 2020/22 academic year, 36,420 learners took 73,020 formula funded ESOL courses at level 2 and below. This includes 56,770 courses at Entry level, 11,620 at level 1 and 4,630 at level 2. A Learning and Work mapping project undertaken in 2017, indicated that there is significant unmet demand for ESOL and any cuts to funding for ESOL would widen the gap on provision. These numbers reflect the number of learners participating in formal ESOL education but do not include the additional ESOL learning taking place through community learning and other informal learning routes.

The Mayor would like to emphasise the importance of provision at levels 1 and 2. While numbers taking courses at level 1 and 2 are relatively low, this is due in part to structural funding factors which lead to funnelling of ESOL learners into Functional Skills English courses, rather than a lack of need for specific ESOL provision at these levels (Functional Skills English is funded at a higher rate than ESOL, and is fully funded regardless of income, leading to providers and learners opting for Functional Skills English over ESOL). Functional Skills English is not the most appropriate provision for ESOL learners, as it assumes fluency in speaking and listening and the hours available per course are significantly lower than for ESOL courses.

English language skills are critical to support a range of social and economic outcomes, including social and economic integration, social mobility, wellbeing and participation in society. Progressing through ESOL provision at entry level and levels 1 and 2 is important to enable Londoners to access higher level skills provision, further education, or progress into employment. Many ESOL learners were highly qualified professionals in their country of origin, and ESOL provision at these levels is an important route to enable them to bring their skills to the UK labour market. For example, GLA commissioned research on Hong Kongers in London found that 60-85% have an undergraduate degree or higher, and that financial services/ industries were the most common sector of employment for Hong Kongers before they moved to the UK.

Finally, given new resettlement schemes and immigration routes for Hong Kongers, Ukrainians and Afghans, there is a need to ensure that ESOL provision is well funded and able to meet the current and long-term demand and needs of learners. Ministry of Justice research suggests that 68% of Afghan evacuees have little or no English language skills, and DLUCH estimates that up to 33% of the approximately 300,000 arrivals from Hong Kong will have English language needs.

30 Do you agree that we should develop national standards and set broad core content at level 1 for: i) Personal and social development ii) Employability skills iii) Independent living and life skills

See response to question 31.

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: i) Personal and social development ii) Employability skills iii) Independent living and life skills

National standards and set core content at entry level for personal and social development, employability skills and independent living and life skills (PSE) would give a clear indication to providers of what PSE content they are expected to deliver which may improve consistency across providers of both quality and content.

This could however have the potential to reduce providers' flexibility to adapt the PSE they offer to meet their learners' needs, reducing its effectiveness. For example, the independent living and life skills may be different for learners at various stages of their life and providers should be able to adapt their provision to meet these needs. For example, independent living and life qualifications may look different for adults who are living with dependents (whether children or if they are carers for an adult), and those who are living alone.

For some SEND learners, or learners with impairments, being able to live entirely independently may not be the end learning aim. Instead, developing skills that enable them to live more independently in one or two areas may be a significant change.

It is not possible to comment further on the appropriateness of national standards and broad content for PSE qualifications without further detail on the specifics of the proposals. Any proposals in this area should ensure that providers have the flexibility to meet the needs of their learners as outlined above.

32 Do you agree the national standards set out above will cover the range of skills needed by students? 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?

The anticipated content for national standards as laid out in the consultation documents correspond to what the Mayor would consider the key areas for PSE qualifications.

It is not possible, however, to know from what has been laid out in the consultation whether the standards set out will cover the range of skills needed by learners. The needs of communities and employers also change over time, sometimes slowly and sometimes - as seen in the Covid-19 pandemic - more quickly. These changes do not necessarily take place in a uniform fashion across regions or localities. It will therefore be important that the GLA and MCAs are able to exercise discretion when determining how to meet local needs.

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?

It would be beneficial for learners who are at a significant distance from the labour market to have the opportunity to explore industries and occupations without committing to an occupational learning path.

Qualifications available at entry level 1 and 2 that allow learners to undertake single taster sessions in skills related to an occupation, for example construction, may ease learner concerns around taking part in further education and determine whether they are interested in entering a related pathway. Support should be given to the learners taking part in these qualifications to understand how to progress in these industries if desired or to find suitable alternatives.

As with all learning at these levels, progression pathways should be clear for learners while also being flexible enough to allow different routes to be taken.

Chapter 6: Delivering quality

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

If the reforms laid out in this proposal are to be implemented, there needs to be significant investment in the advice and guidance available to learners, for both young people and adults, to ensure that they can access pathways that lead to the desired social and economic outcomes.

Additional thought needs to be given to how learners can move between pathways if they determine that they are not on the correct pathway. Wraparound support will be needed to increase retention across all qualification levels and additional support given to learners to move between levels.

Providers will require clear guidance on how qualifications at level 2 and below link to progression and positive outcomes for learners. If there is a reduction in awarding bodies as a result of this process, providers will need support in gaining approval to deliver qualifications with different awarding bodies. This process will need to be as

seamless as possible and additional resource may need to be considered for the GLA/ MCAs who are commissioning these qualifications.

Providers would require 12 months' notice of changes to enable them to effectively curriculum plan and update their websites and marketing materials. Funders such as the GLA (and MCAs) will also require lead-in times to develop appropriate funding systems and measures of success for providers.

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?

Government should have conducted a full and thorough equality impact assessment before taking these proposals to consultation. It is known that those who participate in adult education particularly at level 2 and below, are more likely to have a protected characteristic than at higher levels of education.

The removal of such a large number of qualifications should not be conducted without a thorough understanding of how that will impact learners.

This consultation, with minimal discussion of PSE qualifications, does not allow respondents to fully understand the consequences of these reviews for learners for whom health, personal and wellbeing outcomes may be the primary driver for participating in education at this level.

Further assessment of the impact of proposed changes should examine in detail the needs of SEND learners who are over-represented in adult skills provision at level 2 and below.

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?

The impact assessment DfE publish in response to this consultation should include the impact on the delegated powers of the Mayor of London (and devolved powers to MCAs). It should be clear how the delegated/devolved responsibilities of these bodies will be recognised and if appropriate, expanded when considering the proposals laid out in this consultation.

This is particularly important given the breadth of qualifications affected. As the Association of Colleges have outlined in their response, smaller colleges may not be able to run programmes in similar subjects but different pathways at the same time. It will therefore be key to the success of the skills system at these levels that the GLA/MCAs are able to coordinate provision across their regions to ensure that learners have access to the appropriate skills and pathways.

The proposals for qualification reform at level 2 and below laid out in this consultation place a significant importance on progression routes. Learners undertaking qualifications will require independent information, advice and guidance

to understand the routes available to them and ensure that they are able to enter the skill system at the right level of qualification. This independent advice and guidance should be available to learners throughout their learning journey. This will require significant investment from government to ensure providers are able to deliver the high-quality independent advice and guidance needed by learners to navigate this new system.

As outlined throughout this consultation response the lack of acknowledgement of the benefits of education at this level beyond employment and skills progression has not been considered appropriately. The social and community benefits of education at this level should be a significant factor when determining what qualifications should be funded

As set out in responses to government consultations on other post-16 skills and further education proposals it is essential that government ensures consideration of these benefits can be encouraged amidst wider further education reforms.