

## AQA evidence submission

AQA response to a Department for Education consultation, [Post-16 Level 3 and Below Pathways](#).

Monday 12 January 2026

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### V Levels

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

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

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

AQA welcomes the Skills White Paper and many of the proposals within it. We are firmly committed to working with Government, the regulator and the wider system to implement the proposals to support young people, help tackle the NEET challenge, strengthen the quality and credibility of vocational education, and improve skills and productivity. However, we believe that there are some changes needed, including to the timetable, to enable the system to implement the proposals in a way that meets the Government's objectives, and enables the system to focus sufficiently on quality. The proposals imply a significant reshaping of provision, in particular with the focus on smaller vocational qualifications, which providers will need time and support to plan for.

We do not believe that the document makes a compelling case to restrict all V Levels to 360 guided learning hours. This restriction would mean some V Levels not covering in sufficient depth the range of content implied by their purpose. It would also make it harder for some students to make level 3 choices that fully engaged them and supported progression – for example if they were particularly interested in one sector, but did not want to commit to a full T Level, or if the relevant T Level was not available in that area. It would be particularly challenging for colleges that did not offer A-levels to create coherent programmes of study if V Levels were restricted to the size of one A-level.

We would therefore recommend allowing subject development groups to propose either a double V Level or a pair of V Levels covering different aspects of a subject which could be taken together or individually, to increase flexibility and choice, and to enable a wider range of students to study programmes they find coherent and engaging.

In addition, we would recommend that the Government uses this welcome revamp of the qualifications offer to reconsider whether T Levels can perform the role proposed for them – to be the only large vocational option available – for every sector and occupation. We expect that in some cases demand from employers and students for large qualifications will significantly outstrip capacity to provide T Levels, especially industry placements. We would advise Government not to force itself to choose between lowering the standard of T Levels or removing good opportunities to study large qualifications in sectors which need them.

**Which subjects do you think are most appropriate for delivery through V Levels? Please provide evidence of relevance to employment sectors or further study.**

We are broadly supportive of the list on page 19 of the consultation document. We would advise Government not to expand the list much further: keeping the number of V Level subjects manageable will help colleges to offer a broad range of subjects, allow other providers including sixth form colleges and schools to consider providing V Levels, and enable awarding organisations to focus on producing high-quality qualifications which provide a broad range of progression options. We must also make sure that the V Level offer remains distinct from A-levels, with no blurring of the boundaries.

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

The starting point must be to design V Levels in a way that supports employer and higher education confidence and therefore progression opportunities: they must not become quasi-academic qualifications, in their content or assessment. From experience of previous qualifications of this type, there is a risk that progression from V Levels will be poor, if they provide neither the specific experience and skills needed by occupations in their sector, nor the wider skills and experience that will be of interest to other sectors or to higher education institutions. DfE should not repeat the mistake sometimes made in the past, of assuming that employer or HEI involvement in or endorsement of a V level, or basing it on occupational standards, will guarantee it will support progression: long experience shows that is not the case.

V Levels therefore need to be designed with explicit consideration of the wider skills and knowledge that students could develop and then demonstrate through achieving a V Level. There should also be consideration of what that means for the content and design of the qualification, reflecting differences between subjects while looking for commonality across them. We recommend that this should be part of the ask of subject development groups, and that awarding organisations should have the flexibility to innovate to strengthen progression as they design qualifications. Furthermore, the same principles should apply to the new level 2 pathways, especially Foundation Certificates. However, we are concerned that the proposed timetable will not allow the development process to explore and reflect different approaches to enabling progression.

We are not convinced about the idea of rules of combination requirements beyond the use of discount codes for performance tables: it would add complexity to the system and limit the flexibility for providers to develop programmes that meet the needs of their students.

With more time, we are confident that providers – with support from awarding organisations and others – could develop engaging and valuable level 3 programmes, including V Levels, and provide this cohort of students with high quality advice to support their choices, giving them the respect and progression opportunities that they deserve.

## **New T Levels**

**What factors should we consider when creating T Levels where there are currently no level 3 occupational standards? Please explain your answer.**

We would advise that the Government starts by understanding why there are currently no occupational standards in these areas, and what that says both about the capacity of the sector to collaborate and the value of level 3 post-16 study as a route into occupations within the industry. Without sector-wide credibility and demand, T Levels may struggle both with delivery and with providing good progression opportunities. Government should be open to the possibility that the extra flexibility of V Levels may be a better option than T Levels for some occupations, especially if there is the option of a double V Level (as we recommend). We would advise taking the opportunity to look more widely at the expectations on T Levels in the context of the wider qualifications offer that is now being developed.

## **Level 2 pathways**

**We recognise that students do change their minds, and some students may wish to transfer between the Further Study pathway and the Occupational pathway. Others may have the opportunity to progress to level 3 or take up an apprenticeship opportunity mid-way through their Occupational Certificate.**

**How can the two pathways, and the two qualifications, be designed to make these transitions as easy as possible?**

In some subjects, it may be possible for the broad introductory core content of the Occupational Certificate to be the same as the Foundation Certificate, allowing students to decide whether to do the Foundation Certificate assessment at the end of their first year and go on to a level 3 course, or to continue with the level 2 occupation-specific content for the next year to get an Occupational Certificate. If this could be done, it would help to de-risk the decision for these students at age 16, and help providers with advice and guidance as well as timetabling. Whether the same content would work for both purposes would need exploring on a subject-by-subject basis, though there is unlikely to be time for such exploration if Government proceeds with the proposed timetable. Similarly, more time would allow read-across between the content of occupational certificates and related apprenticeships, to support progression.

For subjects where progression to level 3 (especially V Levels) needs different content from an Occupational Certificate, the level 2 pathways should still be developed alongside each other so the areas of commonality between them can be articulated, to help providers to support students who want

to switch between the routes. It may be possible to modularise the Certificates and have some shared modules between them, but given past experience of modularisation this would need to be tested carefully first. However, we need to recognise the costs and logistical complexity for providers of large numbers of students switching courses, and not design a system that encourages that.

## Foundation Certificates

**We're proposing that all Foundation Certificates are the same size – 240 guided learning hours (GLH) – to ensure they are a consistent size and can fit within a one-year study programme allowing for English, maths and non-qualification activity such as employability, enrichment and pastoral support, and exposure to level 3 study. In taking this approach, are there any risks or issues we need to be aware of?**

We support this proposal.

**Should any additional criteria be considered when selecting the subjects suitable to become a Foundation Certificate?**

No.

**Are there any other potential subjects you think should be considered for Foundation Certificates?**

Yes.

There is no explanation given for why Sales, Retail and Customer Service should be available as a V Level but not a Foundation Certificate, given the range of skills and progression opportunities it would seem to provide.

## Occupational Certificates

**We are proposing that DfE sets the introductory core content for Occupational Certificates and that this core content is shared across related qualifications. Do you agree with this approach?**

Yes.

**Please give reasons for your answer.**

This will enable comparability and consistency across awarding organisations, which will improve employer trust and confidence in the qualifications. It will enable mobility between occupations within a sector, and potentially between pathways. It will also allow Government to make sure the content provides sufficient breadth and prepares students for potential future developments in the sector, such as technological change.

DfE will need to explore with employers and providers what is meant by 'classroom-based provision', so that Occupational Pathways are both deliverable and provide students with the range of skills and experience needed to support progression into employment.

DfE should put in place arrangements to keep this content (and all other content for which it takes responsibility) under regular review to make sure it continues to meet employers' needs, especially in sectors likely to be subject to rapid change. Ofqual should also regularly review the regulatory arrangements, in particular the validity of the assessment arrangements.

**We believe the sizes of each Occupational Certificate should be variable and driven by the Skills England national occupational standard(s) it is linked to, as opposed to having a fixed size for all Occupational Certificates. Do you foresee any challenges with this approach?**

Yes.

**If so, what are they and how might they be overcome?**

We would recommend that the introductory core content for each sector should be chosen to be about the same size across different subjects, if possible, to enable flexibility and mobility, potentially including between pathways. If there need to be significant differences in size, that should ideally be in the occupation-specific content. We would suggest that Government gives subject development groups guidance about maximum and minimum sizes for Occupational Certificates.

More generally, we would encourage Government to engage with providers to understand any delivery challenges that might arise if there are significant differences between the sizes of different Occupational Certificates, and what that would mean for funding, timetabling and student choices.

**We are proposing the size of the broad introductory core content should be proportionate and should be less than 50% of the overall guided learning hours (GLH). Do you foresee any challenges with this approach?**

No.

**If so, what are they and how might they be overcome?**

We think this is a reasonable approach, and while there will no doubt be challenges – especially if there is an ambition to create a common content across Occupational Certificates and Foundation Certificates – we would be confident they could be resolved with sufficient time and will.

## **Non-qualification activity**

**What non-qualification activities do you think are successful at supporting vocational students to engage best in their course content in order to achieve in their course and progress to their stated destination?**

This will vary by subject. We would suggest allowing subject development groups to give optional guidance to providers and students about the types of wider activities that would best complement their formal studies if they wished to progress into the relevant sector.

## **Transition and branding**

**We plan to roll out V Levels, Foundation Certificates, and Occupational Certificates together by route, to ensure coherence across levels and clear progression.**

**Do you think this is the best approach? Are there alternative rollout strategies we should consider, or any unintended consequences we might be overlooking?**

We agree with a route-based roll-out, which is in line with our view that the new qualifications need to be seen as part of a wider system, offering a coherent set of options and progression routes for students with different aptitudes and ambitions. The specification of the new qualifications should take account of existing and planned KS4 technical certificates, A-levels, T Levels and apprenticeships (including foundation apprenticeships), and subject development groups should be asked to make sure that the new qualifications are distinct and complementary. This will help students and providers to understand and be confident in the range of options available in a particular sector, and how they relate to one another, recognising that slightly different solutions may work for different sectors.

Given the amount of change over the next few years, we would advise that DfE does a cohort-by-cohort map of the options available, and makes sure that each cohort will have an offer that works for all students.

More widely, as noted in many of our responses to other questions in this consultation, we have very serious concerns about the planned timetable, with the proposal to have the first V Levels, Foundation Certificates and Occupational Certificates ready for first teaching from September 2027. There is no reason to go at this speed: it sends a damaging signal that Government does not value quality in vocational qualifications, especially by comparison with the carefully planned roll-out of general qualifications following the Curriculum and Assessment Review. The proposed timetable is in clear breach of the firm commitment in Labour's Mission Document, which underpinned the Government's Manifesto, to give enough time for providers to prepare for curriculum reforms. We would strongly urge the Government to reconsider and thereby show that it takes vocational qualifications seriously.

The proposed timetable risks not allowing sufficient time for high-quality content development, particularly for the early tranches of the new qualifications. This would in turn carry serious risks to quality and progression, and could mean that many of the exciting opportunities from these reforms – which we enthusiastically support – will risk being lost. As established awarding organisations, including AQA and TQUK, we will do our best to produce high quality qualifications and innovative assessments, but the timetable will make it harder than it should be for us to do so, and there is therefore a risk that too few qualifications will be accredited in time, leaving providers with limited choice. Most importantly, the timetable will not give providers and teachers time to prepare for the new qualifications, or to develop engaging, coherent study programmes that support students' progression ambitions. We fear that this will seriously undermine the ambitions in the White Paper.

**Are there alternative rollout strategies we should consider, or any unintended consequences we might be overlooking?**

If Government is insistent on going ahead with a rapid timetable, it could perhaps consider a transition period during which existing qualifications continue to be funded for one or two years after the new qualifications are introduced. This will give providers and the market more time to adapt to the changes and focus on quality.

## **What steps should we take to ensure the outline content for V Levels, Foundation Certificates and Occupational Certificates is high-quality across subjects and awarding organisations?**

The three most important steps Government could take that would support quality in these qualifications, as set out in answers to other questions, would be:

- Amend the timetable to allow every part of the process and every bit of the system the time needed to focus on quality, rather than on rushing to meet deadlines.
- Make sure the subject development process builds into the design consideration of the skills and knowledge needed to support a range of progression opportunities for each qualification in each subject.
- See the new qualifications as part of a wider system, and take the opportunity to consider how choices and progression routes will work for all students in all sectors, and how all qualifications, including T Levels, can support that.

More generally, Government should make a long-term commitment to the new suites of qualifications proposed in the White Paper, to give awarding organisations the confidence to invest in high quality products and wider support.

## **We're proposing that there is no awarding organisation branding for V Levels, Foundation Certificate and Occupational Certificate titles to make qualifications easier to understand.**

### **Do you foresee any problems with this? How could we mitigate these?**

We agree. The approach used for A-levels and GCSEs works well and should be used for V Levels and the other new qualifications.

## **Equalities impact**

**In accordance with the Equality Act 2010, Ministers must have “due regard”, when making decisions, to the need to eliminate unlawful discrimination; advance equality of opportunity; and foster good relations, in relation to protected characteristics. The Department has been taking this requirement into account in developing these proposals and will use findings from this consultation to develop a full assessment. The relevant protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.**

### **Could any of the proposals have an impact – positive or negative – on people with any of the following protected characteristics?**

Age and disability.

### **Please explain your answer. What action could help reduce any negative impacts you identified in the previous question?**

We would recommend that Government assesses which qualifications designed for 16-19 year olds are also used for adult learning, and the potential impact of withdrawal of those qualifications.

There can be significant challenges for students with disabilities to access both curriculum and assessment in vocational qualifications. As part of the development and preparation for delivery of the new qualifications, the system should be looking at lessons from existing qualifications – of all types – to try and improve accessibility, and in particular the opportunities from innovation in assessment. For example, we know that many accessibility issues can be solved through the use of on-screen assessment.

More generally, we know that providers have to deal with inequality of access to resources and opportunities – some work placements and apprenticeships, for example, are secured through existing networks, which may be less available to some groups of students – and that many subjects show a significant gender bias. We do not think that these reforms will make these problems worse, but we want to work with others to find ways to help improve the opportunities for all students, as part of the design and support for delivery of our new qualifications.

**Are there elements of V Levels or Foundation and Occupational Certificates that are required in your view to increase accessibility or improve outcomes for those with SEND?**

We agree that the vast majority of post-16 students should be asked to choose from a relatively limited number of high-quality options, which are easy for providers to manage and for employers to understand, and which do not unduly limit progression opportunities.

However, we must make sure that there is an offer that works for every single student in the cohort, and we are concerned that there will be some students with particular needs or challenges, including some high ability students, who may need something more flexible or distinct. We recommend that DfE therefore allows providers to make a case to offer study programmes using qualifications outside the usual routes, where they can demonstrate that is the best way of meeting the needs of particular groups of students, or to reflect MCA priorities. DfE must keep the impact of the changes actively under review to make sure it is supporting progression as intended.