

INDEPENDENT HIGHER EDUCATION

IHE response to the DfE consultation on Post-16
Level 3 and below pathways

January 2026

We are proposing V Levels will be 360 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.

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

Many IHE members are specialist higher technical education providers offering courses below and up to degree level in a specialist subject. Our members also offer apprenticeships and direct to employer courses in specialist skills areas including STEM, culinary, business and creative industries. Several of our members deliver specialist programmes in partnership with schools, such as Leiths Education who offer food and nutrition courses across all key stage levels.

IHE welcomes the Department for Education's ambition to simplify the Level 3 and below qualification landscape and improve clarity for learners, providers and employers. Our members support the principle of streamlining pathways where this helps reduce confusion and strengthens vocational and technical education. However, we have concerns about specific risks that must be addressed to ensure the proposed reforms genuinely widen opportunity, support progression and maintain quality.

While simplification is a positive aim, the proposed V Levels appear significantly narrower and more occupation-focused than some existing Level 3 programmes. Many current vocational pathways (including diplomas) successfully combine practical skills with broader knowledge, enabling students to progress into diverse higher education routes. Members are concerned that replacing these with a more tightly defined V Level model could reduce flexibility for learners who are still exploring options and may not know what specific occupation they want

to move into at age 16. These students may end up paying more in the long run to get the right qualifications later in life.

A further risk is that narrowly focused V Levels may not adequately equip students with the breadth of knowledge and skills needed for successful progression into the range of higher education or apprenticeships available, while also not reaching the required depth of knowledge to step into a skilled role. It is unlikely that V Levels will achieve the required depth to fulfil the requirements of most Level 3 roles within a 360 GLH model. Many sectors – such as technical, creative arts and culinary subjects – would not consider this sufficient to develop the depth of skill required for employment; more time is needed for meaningful (and essential) practical work, portfolios and applied learning.

However, IHE members recognise that to ensure V Levels are available more widely, they must be easily timetabled alongside the A Level model, which means matching the same guided learning hours. In the past IHE members have supported programmes in specialist areas designed to sit alongside A Levels but without matched guided learning hours, and uptake from schools was very low.

As in all courses of study, there needs to be a balance between breadth and depth. Across our members there was a strong preference that V Levels operate in a similar model to A Levels, supporting a breadth of knowledge to allow learners to gain a base level of practical skills that could be built upon with further training or study. For most members, accessibility of the V Level widely across schools was more important than offering larger guided learning hours to meet specialist occupational needs. T Levels (or suitable alternatives as discussed later in our response) would then be the alternative for those students seeking depth in a particular occupation at Level 3.

It is vital that V Levels be clear in what they can achieve to students, further study providers and employers. Setting realistic expectations on depth, while also ensuring that students can access these programmes alongside their A Levels is the preferable model as it offers the practical alternative to A Levels needed in the current system. Any perception that V Levels could limit access to HE or jobs due to a mismatch between expectation and delivery would damage learner aspirations and qualification viability.

Another risk is the recognition of V Levels by employers and for admission into higher Level study. V Levels will not be widely recognised immediately, and substantial work would be required before they could reliably produce job-ready graduates. Building employer understanding of and confidence in the qualification would take significant planning and employer engagement in the design and assessment of the qualification, and alignment with industry standards - which will vary across sectors.

Workforce is another significant risk. To ensure that V Levels are delivering work-ready skills to students would require engagement from staff with up-to-date industry experience and adequate training for those delivering on a more regular basis across schools and colleges. Our members have shared their experiences of challenges in recruiting and retraining staff with industry experience who can deliver up-to-date skills at all levels, but in particular at Level 2 and 3 due in part to salary expectations. This will become more of a challenge if demand is widespread with the introduction of V Levels. IHE recommends that the DfE considers a national workforce plan that includes collaboration with specialist FE colleges and higher

education providers as well as industry; without this, these staffing challenges risk undermining the implementation of V Levels.

IHE strongly cautions against removing existing Level 3 vocational qualifications before V Levels have demonstrated that they can deliver equivalent or better outcomes. Large, coherent vocational programmes – such as diplomas – are proven to deliver strong outcomes, support social mobility, and enable progression into employment and higher education. They are also vital in some areas of SEND education, providing viable alternative routes into work. Removing these options prematurely risks narrowing opportunities for learners and the availability of skills pipelines for industries already facing shortages. There is strong support within our membership for maintaining parallel routes (e.g. BTECS, diplomas) until V Levels have been fully tested and evaluated, in consultation with employers and higher education providers.

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

The absence of medium-sized V Levels presents material risks for learners and sectors where occupational competence depends on extended practical training and coherent, specialist progression routes. This is particularly evident in subject areas such as creative arts, culinary, and hair and beauty, where current two-year diplomas (typically around 1,000+ GLH) provide the depth, time, and technical sequencing required for safe and competent entry to employment. In these fields, no viable T Level alternative exists, and the proposed 360 GLH V Levels do not supply sufficient duration or scope to meet industry expectations.

For providers in these sectors, the proposed structure creates three interrelated risks:

1. Reduced occupational competence

Employers are unlikely to regard a single 360 GLH V Level as sufficient preparation for entry-level roles in practical, skills-intensive fields. This risks re-creating skills gaps previously addressed by larger vocational programmes and may lead to increased demand for remedial training by employers.

2. Weakened progression pathways

In the absence of a T Level pathway, learners who wish to specialise at Level 3 will be compelled to combine multiple small V Levels or mix vocational units with A Levels. While this will benefit some learners, many seeking a cohesive vocational route will find it difficult to assemble a programme that delivers both depth and continuity. This fragmentation risks undermining motivation and learner retention.

3. Inconsistent subject availability and programme coherence

In several sectors, the necessary complementary A Levels are not widely available (e.g., Food and Nutrition for culinary pathways). Without these, learners cannot build programmes that integrate technical, practical, and theoretical learning in ways that support higher-Level study or workforce readiness.

Although the 360 GLH model has value—particularly its focus on demand-tested provision and alignment to employer needs—it should not be positioned as a replacement for larger vocational programmes. Instead, the V Level framework should accommodate broader subject-area strands within a single qualification structure where a full T Level is not feasible. This would ensure that students can pursue coherent specialist programmes while maintaining flexibility to combine academic and technical elements where appropriate.

Overall, medium-sized options are necessary in sectors where occupational competence cannot be achieved through short qualifications alone. Without them, learners in practical vocational disciplines may face constrained choices, weaker progression opportunities, and reduced employer confidence in Level 3 outcomes. A more flexible V Level architecture—incorporating larger, specialist variants in key sectors—is required to preserve high-quality pathways and secure positive transitions into work or further study.

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

IHE supports the development of V Levels where they can genuinely deliver industry-relevant skills, support progression into employment or further study, and complement existing pathways. Our members emphasise that V Levels should not be tied narrowly to single occupations; rather, they should develop transferable, industry-relevant competencies that keep options open across related roles and further study.

When selecting subject areas for V Levels, we would encourage the DfE to apply the following principles:

- V Levels should provide competencies that are recognised by employers and map to credible next steps such as employment or further study. For example, Games Industry V Level where students can use skills to start out in the industry at a low Level, get an apprenticeship because they have the skills to be useful from the start OR develop a portfolio for entry into a games course.
- V Levels should teach skills needed for the first stages of careers or professions and where appropriate, integrate industry-endorsed training or mandatory certificates that enhance employability (e.g. CSCS test preparation in construction, safeguarding in sports coaching, food hygiene and allergy awareness in culinary).
- Rather than tying content to a single occupational standard, V Levels should be designed to offer students skills that promote choice within an industry, so learners can specialise while retaining flexibility.
- Content should be co-designed with employers and specialist FE colleges/higher education providers, with refresh cycles that can keep pace with innovation (particularly in fast-moving sectors like digital and creative industries).
- V Levels should add value where T Levels are absent or undersubscribed, and where paired study with A Level strengthens progression (e.g. combining a V Level in culinary operations with A Level Food and Nutrition to deepen theoretical understanding). They should not replicate T Levels but instead fill gaps in provision and offer credible alternative pathways for learners.

- V Levels must include a mandatory module on roles, progression routes, and workplace expectations within the industry, helping learners make informed decisions about their next steps and future (e.g. apprenticeships or further study in emerging careers).

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

IHE agrees that reforms at Level 3 and below will only succeed if students, parents/carers, schools, FE colleges, higher education providers and employers can clearly understand the options, combinations and progression routes. At present, awareness and recognition of new qualifications can lag – especially among employers – leading to uncertainty and slower uptake. We therefore recommend IAG (Information Advice and Guidance) which delivers clarity on pathways and enables students to select appropriate combinations and understand credible destinations, whilst also linking to LSIPs and funding, to build confidence among learners and employers, accelerating recognition and uptake of V Levels.

There needs to be clear roles for employers, professional and industry bodies in advice and guidance at each stage of secondary education where subject selection is relevant. Those offering learners careers advice and guidance need to be equipped with resources and training to do so (including visual, real-life case studies and pathway maps).

Pathway maps should be developed for each new programme showing progression routes to further study including Level 3 and 4 courses, apprenticeships, as well as degree Level programmes. While the requirement for these is already part of the Ofqual approval process for V Levels there is no clear role for education providers, who are not awarding bodies, within the process. We would encourage government to ensure there is a clear role for providers who will deliver the qualifications, and for those who would be part of the progression pathways.

Progression pathway maps should be accompanied by information about funding options, including where courses link to local initiatives and activities funded through devolved skills funding. Local Skills Improvement Plans (LSIPs) should be encouraged to identify V Levels which map onto the provision they are funding to address students who want further study in vocational pathways closer to home. Courses fully funded by Local Skills Fund (LISF) should be identified in this guidance. Tools to support employers to understand how V Levels might fit into their recruitment strategy will be vital as local employers have significant interaction with and influence on secondary school students.

Future plans for regional outreach and access to HE initiatives currently under consultation by OfS and proposed in the Post-16 Skills White Paper should also include IAG and mapping to higher education programmes for V Levels and T Level alternatives in due course.

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

IHE members strongly support a careful, evidence-led approach to developing T Levels or T Level alternatives in areas without existing Level 3 occupational standards. In several sectors – particularly creative and technology – standards are absent, outdated or too narrowly defined, which undermines the qualification relevance and employer confidence. Where Level 3

occupational standards do not exist or are not fit for purpose, such as culinary education, T Levels should be built through genuine industry co-design with teaching providers and awarding bodies to ensure they include core, transferable competencies and the portfolio/assessment evidence that signals readiness for entry-level roles or progression to higher study. Involving higher education providers like Leiths Education and broadening the range of organisations contributing to development will ensure programmes reflect contemporary practice and gain employer confidence.

The T Level programme has faced challenges in specific industry areas, many of which the V Level model seeks to address. The most valuable would be the ability to diversify awarding bodies beyond the single awarding body tendered for the broad subject area. This will encourage innovation in the offer to students and employers and enable more specialist vocational qualifications to be developed. We also support more focus on specific industry skill needs and evidence of progression routes into occupations or further study. Finally, IHE members have noted low enrolments in T Levels and note V Level proposals to also explore student demand as a welcome addition. Adopting these models in the creation of new T Levels or equivalent vocational qualifications would increase the probability of successful transition from conception to delivery.

IHE also accepts the likely scenario where the best model for students and employers is a vocational course which does not operate exactly like a T Level or a V Level, but something in-between. We encourage DfE to hold regulatory space for innovations which can be proven to deliver positive outcomes for students and meet employer needs, and include them in the T Level/V Level package where possible. This may be where a longer V Level model fits, or it could be a brand such as 'specialist T Level' which adapts the T Level model slightly. The current proposals to defund that which is not purely T Level or V Level may not be the most productive, but neither would allowing alternatives to develop and be limited in their delivery because they are outside the dominant model. A process for exploring and approving alternatives as part of the T Level or V Level brand, which focuses where student and employer demand coincide, would accelerate growth better than exclusionary models.

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.

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

Flexibility is a core value for IHE, and we believe it should be a core design principle for all education programmes. As such, we support the transition between the two pathways and the two qualifications. Movement between the two pathways should be viewed as positive progression; without changes to performance measures and funding rules, providers may be unintentionally discouraged from supporting learners to progress to employment, apprenticeships or transferring to another qualification or provider.

To make the transition as smooth as possible – and easy, credible and fair - a nested structure is recommended, with a certificate at Level 2 before progression to a Level 3 diploma. The two pathways should share a modular, credit-bearing design with similar assessment approaches, grading frameworks, guided learning hours, learning objectives and skills maps to facilitate movement between each. In addition, clear transfer windows should be set out explicitly so that students understand when and how they can move between the pathways successfully.

We're proposing that all Foundation Certificates are the same size - 240 guided learning hours - 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.

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

Yes. While consistency has benefits, a universal 240 GLH model carries significant risks, particularly for subjects that depend on sustained practical development. In many sectors, such as hair and beauty, culinary arts, and elements of the creative industries, 240 hours is unlikely to provide sufficient time for meaningful practice, portfolio building and consolidation of core techniques. There is a real risk that practical skills will not embed at this size, undermining learner confidence and progression.

We are also concerned about the proposed incorporation of English and maths for all learners within this Level. Some students will already have achieved the required standards and would benefit more from additional time in their chosen specialism. Foundation Certificates should include an industry-relevant approach to teaching English and maths. Embedding these skills within industry-relevant contexts (e.g. costings, customer communication) would be far more engaging and would support motivation and achievement, than removing learners from practical environments. Our members report that the highest drop-out risk at a similar Level of study in the current model, is student non-attendance at standalone English and Maths provision. DfE should enable and support the development of English and Maths curriculum that uses practical approaches from the subject area/occupation and is more embedded in the certificate.

More broadly, if Foundation Certificates are capped at 240 GLH, the design should make explicit where and how learners can build further capability—for instance, by mapping clear progression into larger Level 2 or Level 3 programmes (including diplomas) where occupational competence requires more extensive training. It is unrealistic to expect all technical areas to achieve comparable outcomes in the same hours; therefore, guidance should focus on minimum skill thresholds at 240 GLH and signpost the next steps needed to reach employment-readiness in practice-heavy subjects.

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

Yes. Additional criteria should be considered to ensure that Foundation Certificates are deliverable to a high standard and genuinely support learner progression.

Firstly, subjects selected for Foundation Certificates must have access to specialist staff and specialist facilities. Many vocational areas, such as culinary arts and the creative industries, cannot be delivered effectively without trained practitioners and industry-standard environments. It is not realistic to expect a newly qualified PGCE teacher to deliver specialist vocational content without targeted training and support. A funded national pathway for upskilling teaching staff would therefore be essential, and IHE members already contribute to such workforce development in areas like culinary arts, finance and creative industries.

Second, pedagogy must be central in determining suitability. Foundation Certificates require a pedagogical approach that is distinct from traditional classroom-based academic delivery. Practical, applied teaching methods should be embedded as a core design principle, recognising that hands-on learning is essential for developing competence and confidence in many vocational routes.

Third, subjects should be deliverable in both schools and FE colleges and not restricted to just one setting. To achieve this, clearer partnership models need to be in place. Schools should be able to draw on specialist providers, like IHE members, to deliver particular elements of the programme, provide access to industry-standard facilities, or co-teach specialist modules. Incentives for collaboration would strengthen delivery of this.

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

Yes. IHE members, including Education For Industry Group and Leiths Education, have identified several additional subject areas where Foundation Certificates would add value and support progression.

Additional subjects such as Sales, Retail and Customer Service, and Fashion should be considered.

In culinary and food-related areas, there is support for Foundation Certificates in Culinary skills (core and specialist) and Nutrition and Food Science. As there is no A Level in Food and Nutrition or Food Science, this would fill a significant gap and develop progression into V or T Levels.

Bringing Agriculture and Food Science and Culinary together into a broader Nutrition and Food Science certificate, following a lifecycle model, could also be beneficial.

We expect the Occupational pathway to last 2 years, in line with current legislation. However, we recognise that some students may have legitimate reasons for leaving the pathway early, such as progressing to a work-based training programme or moving on to a Level 3 qualification.

10. Are there any other circumstances you believe would justify a student stepping off the pathway before completing the full 2 years? Please provide examples and explain why these should be considered.

The examples provided for leaving the pathway early (progressing to a work-based training programme or moving onto a Level 3 qualification) should be regarded as positive outcome where they support a learner's progression. However, FE colleges may resist multi-year Level 2 programs due to funding rules and high dropout risk. Performance measures need to avoid penalising providers when learners progress early into jobs or apprenticeships; this should be recognised as successful progression rather than as a negative outcome.

IHE agrees that students should be able to move between the two proposed pathways (further study vs. occupational) where this better suits their needs or aspirations. To avoid disadvantaging learners who switch or exit early, clear milestones and recognition of partial achievement (e.g. skills passport or modular credit) should be built into the design of both pathways.

There are also personal circumstances that may justify early exit. Some learners may be required to relocate, for example, those connected to the military or in care, or those from Gypsy, Traveller, Roma, Showmen and Boater (GTRSB) communities), resulting in the Occupational pathway no longer being available at their new provider. Others may take on caring responsibilities or become parents and therefore require a different mode or pace of study. In such cases, it is important that learners are supported to transition smoothly without losing the progress they have made.

Taken together, these considerations reinforce the need for a flexible system that values progression, recognises partial achievement, and supports students whose circumstances change during their programme.

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

No

12. *Please give reasons for your answer.*

We are concerned that core content as described would be very difficult to implement given the range and breadth of provision that could be considered under the Occupational Certificates. It is likely that practical skills would be sacrificed to deliver core content and this would dilute the value of the overall course.

We do however support broad core content that focuses on progression, as this is an area of concern for Occupational Certificates. We would strongly support a core module that focused on career pathways specific to the relevant industry or occupational area. For example, there are specialist career pathways in culinary including work within allied parts of the industry like retail grocery stores, nutrition apps, sustainable agriculture, and similar that would support industry growth but would not necessarily be considered by students. Opening these options at an early stage in the certificate would support learner retention and allow more informed student choice in specialisation.

We would support these types of core content as they can be easily adapted to each occupational area.

We believe the sizes of each Occupational Certificate should be variable and driven by the occupational standard(s) it is linked to, as opposed to having a fixed size for all Occupational Certificates.

13. Do you foresee any challenges with this approach?

No.

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

N/A

We are proposing the size of the broad introductory core content should be proportionate and should be less than 50% of the overall GLH.

15. Do you foresee any challenges with this approach?

No.

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

N/A

17. 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?

IHE supports contextual admissions as a vital mechanism for widening participation and strengthening equality of opportunity across education, including vocational and technical pathways. Sector evidence shows contextual approaches help providers admit based on potential, rather than grades, recognising the structural barriers many learners face and ensuring that students are judged in the context of their individual circumstances (e.g. school performance, socio-economic background or whether they are care experienced) rather than factors which are beyond their control. This is essential to supporting social mobility and enabling all students, regardless of their background and ability to pay, to succeed.

Non-qualification activities play an important role in contextual admissions and addressing equality gaps. Effective activities include high-quality information, advice and guidance, employer-led engagement and mentoring, further opportunities for practical skills development such as work experience, and robust wellbeing and financial support. These will all help vocational learners engage with their course and progress to their next destination.

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

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

IHE is concerned that the proposed timescales for roll out of the new qualifications are unrealistic and risk undermining successful implementation. A first teaching date of 2027 is too soon given the scale of the change, the gaps that still exist in occupational standards, and the significant work required to build employer and provider confidence in the new system. We would recommend prioritising the rollout of new qualifications for emerging industries.

While a route-by-route rollout could provide structure, it must be supported by a clear and publicly accessible timetable and sufficient lead-in time for curriculum development, staffing and training, and employer engagement. We recommend avoiding the premature defunding of existing Level 2 and Level 3 qualifications until the new qualifications exist and have been proven to be effective.

The current proposals do not address the Level 2 programmes offered at 14-16 as alternatives to GCSEs. There is a significant risk that these pathways will disappear if they are not properly aligned with post-16 reforms and the new Foundation and Occupational Certificates. These Level 2 vocational options play a crucial role in keeping learners engaged and supporting progression; their loss would undermine the wider aims of the reform programme. We therefore strongly recommend that Level 2 qualifications for 14-16-year-olds are retained, mapped alongside the new qualifications, and re-funded to ensure they remain a viable route for learners. IHE are happy to discuss our concerns in this area in more detail.

19. 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?

IHE believes that ensuring high-quality outline content across all new qualifications will require a coordinated, properly resourced approach. The Department for Education must recognise the significant cost and capacity implications for providers transitioning to the new system. Sufficient investment is essential so that awarding organisations, schools, colleges and specialist providers can redesign curricula, update facilities, and train staff to deliver new requirements effectively.

There is a need to map the existing Level 2 qualifications currently delivered to ensure they are meaningfully incorporated into the new model. High-quality content cannot be achieved without understanding how these qualifications map to V Levels, Foundation Certificates and Occupational Certificates, and ensuring the system does not inadvertently remove pathways that keep learners engaged.

Consistency of quality will depend on clear, coherent guidance from the outset, alongside strong collaboration with specialist FE colleges and higher education providers, employers and industry bodies. These partners can help shape content that is relevant, deliverable and aligned with sector needs, ensuring the new qualifications meet their aim of strengthening vocational and technical education. We strongly encourage a clear role for providers in the development of outline content for all Levels. In the past the perspective of those who have to deliver programmes developed by Awarding Organisations has been missing or not as strong as it needed to be, resulting in the development of programmes which could then not be delivered to a high standard by design. For example, work placement requirements that were not realistic, or classroom content which did not align with the volume of practical deliver required. The provider perspective is vital to success.

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.

20. Do you foresee any problems with this? How could we mitigate these?

Question on equalities

21. Could any of the proposals have an impact - positive or negative - on people with any of the following protected characteristics?

- **Age** Yes – younger learners may be adversely affected if Level 2 vocational options at 14-16 are lost or do not align with the new post-16 reforms. These qualifications currently keep many learners engaged and support transition into further study.
- **Disability** Yes – students with disabilities are often disproportionately affected by changes in curriculum, assessment systems and new qualification frameworks.
- **Gender reassignment** Unsure
- **Marriage and civil partnership** Unsure
- **Pregnancy and maternity** Yes – the qualifications need to be flexible as learners may become parents and therefore require a different mode or pace of study
- **Race** Yes – there is a risk that removing established pathways may exacerbate existing systemic barriers.
- **Religion or belief** Unsure
- **Sex** Yes – some sectors with gender imbalances (e.g. hair and beauty, construction) may be particularly affected if pathways or qualifications are disrupted, potentially widening existing inequalities.
- **Sexual orientation** Unsure

22. What action could help reduce any negative impacts you identified in the previous question?

Inclusive practice must be embedded from the outset and integrated into curriculum design. Disabled students, SEND specialists and disability organisations should be involved in the development of new curricula. Clear progression routes, accessible information and flexible pathways are essential for groups who rely on structured vocational routes.

Retaining and re-funding 14–16 Level 2 vocational options will help prevent early disengagement from young learners, which could otherwise undermine broader equality and inclusion goals.

23. 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?

N/A

24. Are there any other equality-related impacts you think we should consider?

Regional disparities in qualification availability risk widening inequalities. If the new qualifications are rolled out unevenly across the country, learners in some regions may face reduced choice and poorer access to progression routes.

Learners who are required to relocate during their studies also face greater risk of disadvantage. This includes young people connected to the military, those in care, and Gypsy, Traveller, Roma, Showmen and Boater (GTRSB) communities, who often experience disrupted educational journeys. Maintaining flexibility, including the ability to move between the further study and occupational pathways, is essential to prevent learners from losing progress when pathways are unavailable in their new location. Clear milestones and mechanisms for recognising partial achievement (such as modular credit or skills passports) are therefore critical.

Learners with caring responsibilities - or those whose caring responsibilities change during their programme - may require a different pace or mode of study. Without built-in flexibility, these learners are at higher risk of disengagement or early exit, which would reinforce existing inequalities.

Contact IHE

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