



# **DfE Consultation: Review of post-16 qualifications at level 2 and below in England**

CIMSPA Response

April 2022

The Chartered Institute for the Management of Sport and Physical Activity (CIMSPA) is the representative professional body for the whole of the UK in relation to the sport and physical activity sector, it is the guardian of all associated professional standards, and the QAA-recognised PSRB for higher education institutions. We are the representative entry for the industry in the IfATE Employer Directory. We have both a partnership and a membership model. Our partners consist of employer partners representing 161 employers, 14 awarding organisation partners (offering CIMSPA-endorsed regulated qualifications which enable progress both into direct entry/higher level employment and further or higher study, many of whom are also end-point assessment organisations for 5 apprenticeships standards), and training provider partners offering a wealth of endorsed professional CPD, and formal training leading to CIMSPA membership for industry professionals all which map to the 40 sector lead professional standards.

(Qs 1 – 5 Introduction, Your response and Organisation)

## Question 6

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

**Response: YES**, CIMSPA is of the opinion that it remains crucial to ensure the widest opportunity to progress into higher vocational and technical study, particularly for those learners who are unsure of their career pathways: funding such qualifications as to ensure this choice remains accessible should be a priority.

**ii) Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120–240 GLH?**

**Response: YES**, whilst still sizeable at 120–240 GLH The purpose, content and domain should drive size/GLH. These should be commonly agreed via a set of professional standards (where appropriate) and thereafter the desired learning outcomes will dictate appropriate size. However, keeping them shorter and more focused may contribute to their accessibility, deliverability, and achievement. Keeping this GLH range advisable with a cap will ensure a sufficient degree of flexibility for all types of providers and potential learners.

## Question 7

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

**Response: YES**, the sector CIMSPA represents at Level 2 and below, from an employment entry level is minimal in terms of variety of available roles at this level, however there are substantial numbers of learners who complete. So, where sectors are able to define clear progression routes from this point, they should be funded to ensure equality of access for all learners wishing to pursue such careers, regardless of circumstances.

**ii) 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?**

**Response: YES**, there will always be an element of core, broad knowledge and skills at lower levels, particularly where there has been no previous related learning. This should remain, but the focus should be predominantly on the key employability requirements for a role which is directly linked to such a qualification.

**iii) Do you agree that these qualifications should be large in size (minimum 540 GLH)?**

**Response: NO**, Whilst CIMSPA understands that a two-year programme fits neatly into academic years and associated funding models, it is clear that such a designated size/GLH model on its own is not necessarily either a unique quality mark, nor necessarily value for money. The apprenticeship model has shown at this level that most L2 standards were conceived, and ultimately successfully achieved between the 12-18 months delivery requirement. More specifically to CIMSPA, many delivery hours occur outside the typical classroom (for example: coaching qualifications); additionally, smaller mandatory qualifications such as L2 lifeguarding qualifications are predominantly taught "in situ". These are the success stories and "quick wins" within a much larger and longer apprenticeship suffering (as a result) from high levels of attrition – the Leisure Team member Apprenticeship Standard: although an apprenticeship rather than a standalone qualification, it is similar in size to the proposal here.

**Question 8:**

**For 16 to 19 year olds aiming to enter employment in an occupation at level 2, do you agree that the main qualification offer that should be available is:**

**Option A: Group 2 qualifications only OR**

**Option B: Group 2 qualifications and the alternative of taking two smaller occupational focus qualifications from group 3 (around 350 GLH) in two different occupational routes?**

**Please give reasons for your answer.**

**Response: Option B**, this age group should still be provided the opportunity of choice and flexibility as far as possible in terms of potential career routes. The latter option will assist in this aim.

**Question 9:**

- i) Do you agree that these qualifications should be delivered to 16- to 19-year-olds over two academic years as part of a wider study programme leading to employment?**

**Response: NO**, 16-19 y/o must be in education, training or employment BUT please refer to Q7 for comparison with current models aligned to similar professional standards as for full time study: 2 years is not necessary for quality outcomes at L2 (i.e. for progression into recognised roles, employment or further study) and students will struggle with motivation and retention if kept at this level over such a long period, particularly if they understand that they are able to gain employment if certain aspects of a study programme can lead directly into employment independently.

- ii) If you believe there are any groups of students or occupational routes for which a substantial qualification taken as part of a two-year study programme would be unsuitable, please provide details.**

**Response:** Nothing further to add.

**Question 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?**

**Response: NO**, there are certain sector qualifications which, whilst currently at Level 2, are increasingly asked for by employers at a higher level. We have many introductory occupational roles which are contextualised to a subject specialism (e.g., Assistant Coaching quals in a specific sport, but to progress, specialist roles are necessarily at a higher level).

**Question 11:**

**Do you agree that we should fund qualifications at level 2 that develop cross-sectoral skills for young people? If you agree, are there any examples of qualifications that you think might fall into this group?**

**Response: YES**, conversely a broad introductory range of KSB allows for flexibility and choice when people are deciding on careers/upskilling due to economy/skills landscape shifting etc. Within CIMSPA's sector, there are a huge number of roles and routes requiring cross-sector KSB: e.g., sports or fitness into sport and leisure management; athletes into educators etc.

**Question 12:**

- i) **Do you agree that we should fund qualifications to support progression to specialist level 3 academic qualifications?**

**Response: YES**, nothing further to add.

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

**Response: YES**, nothing further to add.

**Question 13:**

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

**Response: No answer.** CIMSPA does not have a view on this.

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

**Response: No answer.** CIMSPA does not have a view on this.

**Question 14:**

- i) **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?**

**Response: No answer.** CIMSPA's sector does not cover or offer this level of qualification, so no further comment to add.

- ii) **Do you agree that qualifications in this group should be small to medium sized, with a guideline size of 120–280 GLH?**

**Response: No answer.** CIMSPA's sector does not cover or offer this level of qualification, so no further comment to add.

**Question 15:**

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

**Response: YES,** Level 1 and entry qualifications are often a motivation for further learning and should be accessible to the widest population possible.

**Question 16:**

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

**Response: No answer.** CIMSPA has no comment to make.

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

**Response: No answer.** CIMSPA has no comment to make.

**Question 17:**

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

**Response: No answer.** CIMSPA has no comment to make.

- ii) **Do you agree that, for 16- to 19-year-olds, qualifications in this group should be small to medium sized, with a guideline size of 120–280 GLH?**

**Response: No answer.** CIMSPA has no comment to make.

**Question 18:**

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

**Response: No answer.** CIMSPA has no comment to make.

**Question 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?**

**Response: YES,** CIMSPA agrees with all the design principles relating to this group of potential learners.

**Question 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**  
**Response: YES**
- **Group 2: Occupational-entry qualifications** **Response: YES**
- **Group 4: Specialist qualifications** **Response: YES**
- **Group 5: Qualifications supporting cross-sectoral skills** **Response: YES**
- **Group 7: Qualifications supporting progression to level 3 academic study**  
**Response: YES**

**Please give reasons for your answers:**

Unlike 16–19 y/o, adults may be returning for specific goal/career-focussed reasons, or more general aims to get into employment: the broadest range of funded opportunities is welcome.

### Question 21:

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

**Response: YES**, there is a need for flexible learning opportunities throughout adult working lives at all levels of demand in skilled occupations. Many of CIMSPA training partner providers are independent private enterprises, alongside FE establishments, and whose profiles are mostly adult-centred provision.

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

**Response: NO**, please refer to CIMSPA's earlier response on the limitations and risk of mandatory study programmes, as they can steer to a single delivery model which is not reflective of the current picture at this level elsewhere in the education system. There is also a need to reflect adult learning models which should be flexible, bite size and encourage technological innovation.

### Question 22:

- i) **Do you agree that we should consider requests to fund level 2 qualifications for occupations for which an employer-led occupational standard does not currently exist?**

**Response: NO**, CIMSPA does not (is not able to) endorse training and qualifications which do not map to an existing CIMSPA professional standard, nor do we endorse the same if no standard exists. CIMSPA has a fully employer-endorsed workforce occupational route map describing entry and progression opportunities and requirements from student/associate through to chartered fellow status. Any employer-led occupational standard must be developed in partnership and consultation with CIMSPA, and we are keen to keep an open mind regarding sector changes and evolving employer needs.

- ii) **Are you aware of any occupations that are in demand by employers but where an employer-led occupational standard does not currently exist?**

**Response: NO.**



**iii) Do you agree that these qualifications should be available to adults only?**

**Response: NO.**

**Please give reasons for your answer:**

The sector CIMSPA represents is full of examples of young people entering into its organisations and establishments in a wide variety of roles. As the upcoming generation, it is important we enable learners from 16-19 to access these opportunities as well as adults in any form, including outside of an FE setting.

**Question 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 Response: No answer.**
- **Group 10: Level 1 qualifications serving as a prerequisite to employment Response: No answer.**
- **Group 11: Level 1 graded qualifications in performing arts and level 1 project qualifications Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has nothing to add for this question.

**Question 24:**

**Do you agree that we should fund the following qualification groups at entry level for adults?**

- **Group 14: Entry level 3 pre-technical qualifications supporting progression to level 1 Response: No answer.**
- **Group 15: Entry level performing arts graded qualifications Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has nothing to add for this question.

**Question 25:**

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

**Response: No answer.**

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

**Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 26:**

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

**Response: No answer.**

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

**Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 27:**

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

**Response: No answer.**

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

**Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 28:**

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

**Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 29:**

**Do you agree that we should continue to fund ESOL qualifications at each of the following levels?**

- (i) Level 2 Response: No answer.**
- (ii) Level 1 Response: No answer.**
- (iii) Entry level (including sub levels 1,2 and 3) Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 30:**

**Do you agree that we should develop national standards and set broad core content at level 1 for?**

- i) Personal and social development Response: No answer.**
- ii) Employability skills Response: No answer.**
- iii) Independent living and life skills Personal and Social Development Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 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 Response: No answer.**
- ii) Employability skills Response: No answer.**
- iii) Independent living and life skills Response: No answer.**

**Please give reasons for your answer:**

CIMSPA has no comment to make.

**Question 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?**

**Response:** CIMSPA has no comment to make.

**Question 33:**

**Thinking specifically about employability skills:**

- (i) As an employer, do you currently recognise or value any qualifications in employability skills? If so, how do you recognise them and what aspects of these qualifications do you value?**

**Response:** CIMSPA is not an employer in the sense of the role it is playing as a respondent to this consultation. However, we do recognise the value to employers of the broad range of "soft" transferable employability skills. To that end, we are also embedding them within our evolving Core Curriculum. New separate qualifications developed as a result of this consultation may serve to confuse our employer landscape, if they are seen as fundable additional requirements for KSB already embedded within the standards through which existing subject qualifications are already available.

- (ii) **Will the proposed national standards make a difference to the way these qualifications are perceived, valued, or recognised by employers?**

**Response:** No answer.

- (iii) **If so, what difference will they make and how would employability qualifications aligned to standards be used by employers in the future?**

**Response:** CIMSPA has no comment to make.

**Question 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?**

**Response: NO**, there is no need for these within CIMSPA's scope of interest and responsibility.

**Question 35:**

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

**Response:** The circumstances and needs of adults vary considerably and any qualification and delivery offer must be sufficiently flexible to reflect this. One size and shape of qualification and delivery won't fit all. Some young adults (19 to 24) may be more suited to a 16 to 18 study programme model and should be funded to engage this way, whereas older adults may require a modular, bitesize qualification offer which they can juggle with work and caring responsibilities.

**Question 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 characteristics under the Equality Act 2010?**

**Response:** CIMSPA has nothing further to add.

**Question 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?**

**Response:** The impact assessment outlines potential impact on key stakeholders. Potential confusion for students, schools, parents/carers, and employers cannot be underestimated. Neither can the impact of considerable change at level 2 and below and Level 3 while many providers are still supporting students through covid recovery. There is also considerable change in the wider landscape with greater emphasis on Level 4/5 provision and encouraging more adults to upskill and retrain.



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