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Submitted to Post-16 Level 3 and Below Pathways
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V Levels

1 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?:

The Engineering Professors' Council (EPC) represents the UK's engineering higher education academics, with our c.80 institutional members varying in size, location, and operational models and covering all engineering disciplines. Thanks to our outstanding coverage, the EPC serves as a vital gauge for the higher education engineering sector, providing unique insights into the opportunities and challenges affecting the entire landscape.

The Engineering Professors' Council (EPC) recognises the rationale for establishing V Levels at 360 guided learning hours (GLH) to support breadth and flexibility and welcomes the retention of a vocational route, especially into higher education (HE) engineering. However, some material risks emerge from fixing V Levels at the size of a single A level.

For an Engineering V level to have value for higher education (HE) admission, it may require a depth of conceptual and practical learning that exceeds what can be effectively delivered within 360 GLH. This proposal appears to be assuming a more flexible HE admission system without considering the consequences of that for rigour, standards, and professional alignment, potentially rendering the V level only a 'taster'. Existing vocational engineering qualifications benefiting progression into higher education – including BTECs – derive part of their value from extended project work, iterative practical development, and extended exposure to mathematical and scientific principles.

A 360-hour constraint may also reduce providers' ability to deliver meaningful practical and laboratory experience, especially in engineering, where access to workshops, specialist equipment, and iterative testing is essential to achieving robust applied learning outcomes. Maintenance and refresh of specialist hardware and software is a significant undertaking, as it the CPD of staff – it is difficult to see how schools would have the capacity to offer this. Where capital resources are so limited, the compression of content may lead to an over-emphasis on theory at the expense of authentic technical practice. Restricting V Levels to a uniform (smaller) size risks constraining this depth and weakening progression pathways into engineering degrees and higher technical routes. Uniformity of size may introduce unintended disparities in preparedness between subject areas, this may undermine the stated objectives of coherence and parity of esteem.

The EPC recommends that the DfE consider a controlled flexibility mechanism allowing selected subjects (e.g., engineering and manufacturing) to exceed 360 GLH where evidence demonstrates that a larger footprint is required to maintain rigour and meet progression expectations. Without such a mechanism, the proposed structure may limit the effectiveness of V Levels in STEM progression and risk creating a qualification misaligned with employer and higher education needs.

EPC research shows that the value of large qualifications in this space is witnessed by a higher percentage of BTEC engineers five years after graduation remaining in sustained employment than those with four As or more at A level, at 82.6% and 72.5% respectively (LEO, 2020). (Engineering Opportunity (https://epc.ac.uk/uploads/2021/05/Engineering-opportunity_final.pdf), page 8.)

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?

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?:

Yes. Unintended consequences from the removal of medium-sized qualifications include:

1. Loss of a proven progression route into engineering.

Medium-sized engineering qualifications (typically 540–720 GLH) currently serve learners who want to progress to engineering HE. Eliminating this size bracket risks narrowing access to engineering pathways, many of which are integral to the priority areas of the Government's Industrial Strategy and diminishing the flexibility and access advantages that have been a structural strength of the current BTEC system.

EPC analysis of UCAS data shows that, in the 2023/24 academic year, one in eight applicants accepted to undergraduate Engineering held a level 3 BTEC qualification, but the number of accepted applicants holding a BTEC Extended Diploma fell by nearly one-third between 2019 and 2023; a decline most pronounced following the 2021 Government announcement that public funding would be removed from "low-quality" level 3 courses that overlap with A levels and T Levels (including BTECs). Contrary to popular narrative around the suitability of flexible and combined pathways for entry to HE, BTEC Extended Diploma acceptances rarely also presented with A levels.

2. Reduced support for students with lower prior attainment.

A substantial proportion of engineering students who progress from vocational routes—including BTEC and equivalent pathways—enter with lower GCSE profiles but demonstrate strong capability in applied contexts. Medium-sized qualifications offer an essential bridging function for such learners, allowing them to build confidence, accumulate applied experience and complete essential resits. Restricting to 360 GLH may reduce the scope for integrated support and hinder equity of access.

3. Narrower alignment with industrial practice.

Engineering employers value iterative project-based learning, exposure to multi-step design cycles and extended practical competencies. These are difficult to develop within a 360 GLH framework without sacrificing either breadth or depth. Medium-sized qualifications currently provide space for substantial project work, which directly supports employer expectations and higher education readiness. What might a combination of 3 engineering V-levels look like? If they will be controlled to limit overlap it's difficult to see how they will achieve depth, and if they won't there will be a double-assessment risk. (Occupational standards do currently overlap).

4. Potential for negative impact on recruitment and diversity.

Evidence demonstrates that women, disadvantaged learners and under-represented minorities disproportionately enter engineering via vocational rather than academic pathways. Removal of flexible qualification sizes may disproportionately affect these groups, narrowing progression into engineering and undermining widening participation goals.

The EPC recommends that the DfE reconsiders the exclusion of medium-sized qualifications or establishes a clear evidence-based exemption pathway for subjects such as engineering that require additional GLH for valid and reliable delivery.

3 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 unclear how engineering as a V Level subject can be carefully scoped to ensure it remains broad and exploratory (e.g., engineering principles, design, applied physics, electronics fundamentals) within the current proposals. Engineering may need to be further divided to achieve this, which would require very careful consideration, in consultation with HEIs. Current standards do not really lend themselves to this approach.

Consideration should be given to how the design and presentation of any engineering V level may help to address underrepresentation by particular groups in further study in engineering and in engineering careers, most notably women. For example, reports suggest that course titles such as 'Design & engineering', 'Applied Design', 'Engineering & Sustainability' tend to attract more diverse interest than more traditional titles like 'Mechanical Engineering', 'Electrical Engineering' or 'Engineering' itself.

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 V Level subject selection and combinations?

Please give us your views:

PIAG must be enhanced, consistent and sector-informed as a precondition for successful implementation of the proposed pathways, including:

1. Nationally standardised guidance for STEM subject combinations.

Engineering progression frequently requires subject combinations involving mathematics, physics and applied technical subjects. V Level engineering must be presented alongside explicit guidance on pathways into higher education, including the minimum mathematical preparation need for success on engineering degree programmes (this is not uniform across the sector). This includes information on how multiple V levels would work together.

2. Early, mandatory progression mapping.

Students should receive structured guidance at Key Stage 4 (or earlier), including sector-specific progression diagrams illustrating preferred combinations for engineering HE entry. For this to be possible, HEIs will need clear mapping of content, including mathematical content and rigour.

3. Clear delineation of the differences between T Levels and V Levels.

Many students and parents currently conflate vocational and technical routes. The EPC recommends that the DfE should provide standardised comparative materials that outline:
• the exploratory purpose of V Levels,
• the occupational specialism of T Levels,
• the mathematical (and possibly also the creative) expectations of engineering pathways.

4. Clear information about availability

It is not fair to learners to encourage them towards pathways that are not available within the region owing to lack of provision by local schools and colleges or insufficient work experience opportunities. Not only does this require IAG that is able to present this information accurately, but it also underscores the importances of achieving widespread availability of V levels and T levels for them to be successful pathways that support learners and regional economies. How local availability will interface with subject combination guidance and progression mapping will also need to be considered.

New T Levels

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

Please explain your answer.:

1. Address limitations of existing occupational standards.

Existing apprenticeship Standards can be too narrow, so this is an opportunity for the development of Standards through a more open and ongoing evolution, allowing greater input from learning providers before and after the establishment of the standards. Level 3 occupational standards were intended to be “employer-led” but instead they have often become “employer-dominated”, failing to focus on the wider needs of learners and their long-term goals. Additionally, there is a risk that the occupational standards, and V levels, will go out of date quickly in a subject area characterised by rapid global technological innovation (companies are sometimes laggards, and HE is often pioneering.)

To address this imbalance, we need to pool the understanding of educators and of industry to T levels that appeal to prospective apprentices and learners, and provide them, as well as employers, with what they need. New T levels must be partnerships between employers, providers and learners themselves.

2. Higher education progression requirements.

Many T Level routes—especially those in engineering, digital and creative technologies—need to support progression to higher education as well as to work. In the absence of occupational standards, careful engagement with universities is required to ensure T Level content includes adequate mathematical, scientific and analytical depth as well as other skills to underpin HE study, especially in engineering and STEM fields.

3. Risk of premature specialisation.

Without established standards, defining a threshold occupational competence at level 3 may lead to unnecessary narrowing of learning. The EPC recommends that new T Level designs retain broad sector cores that avoid channelling learners into overly specific sub-fields prematurely.

4. Feasibility of delivering a substantial industry placement.

Where standards do not exist, there may also be insufficient employer infrastructure to host meaningful work placements at scale. The EPC recommends that T Levels be introduced only where placement sufficiency can be demonstrated and where placements are capable of contributing substantively to competency development.

Level 2 pathways

6 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?:

Foundation Certificates

7 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?

Please give us your views:

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

Not Answered

If yes, what are they and why?:

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

Not Answered

If yes, what are they and why?:

Occupational Certificates

10 We expect the occupational pathway to last two years, in line with current legislation. However, we recognise that some learners 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. Are there any other circumstances you believe would justify a learner stepping off the pathway before completing the full two years?

Please provide examples and explain why these should be considered.:

11 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?

Not Answered

12 Please give reasons for your answer.

Please give reasons for your answer.:

13 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?

Not Answered

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

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

15 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?

Not Answered

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

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

Non-qualification activity

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?

What non-qualification activities do you think are successful at supporting vocational students to achieve and progress to higher levels of study and employment?:

Transition and branding

18 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?:

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?

Please give us your views:

20 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?:

Equalities impact

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

Age, Disability, Race, Sex

Please explain your answer.:

Potential for negative impact on recruitment and diversity.

Evidence demonstrates that women, disadvantaged learners and under-represented minorities disproportionately enter engineering via vocational rather than academic pathways.

EPC research of UCAS admissions data show that:
• Extended Diploma applicants were more commonly BME than White and BME applicants were more likely to be accepted than their White counterparts. The decline in BTEC acceptances since 2019 has, by and large, bypassed BME applicants.
• Applicants with all types of disability are overrepresented in both the BTEC Extended Diploma applicant and accepted applicant populations.
• BTECs are predominantly the domain of the college sector when it comes to admissions (i.e. attractive to those leave the school system at 16).

• BTEC applications tend to Lower tariff group providers, where they are typically much more successful (to acceptance) than at High tariff group providers.

What's more, EPC research shows that a higher percentage of BTEC engineers five years after graduation remain in sustained employment than those with four As or more at A level, at 82.6% and 72.5% respectively (LEO, 2020). (Engineering Opportunity (https://epc.ac.uk/uploads/2021/05/Engineering-opportunity_final.pdf), page 8)

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

Please give us your views:

V level design must carefully ensure these groups, and wider social mobility, are not disproportionately affected, narrowing progression into engineering and undermining widening participation 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?

Please give us your views:

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

Please give us your views:

About you

25 What is your full name?

Name:
Stella Fowler

26 What is your email address?

name.surname@email.com:
s.fowler@epc.ac.uk

27 Are you happy to be contacted directly about your response?

Yes

28 Are you responding as an individual or on behalf of an organisation?

Organisation

29 As the government analyses the consultation findings, we may identify direct quotes to include in the published government response – may we use your feedback in this way?

Yes, and you can name me/my organisation

30 Would you like us to keep your responses confidential?

No

Reason for confidentiality:

31 If you are responding as an individual, how would you describe yourself?

Occupation:

Other:

32 Which local authority in England are you based in? Please select which local authority in England you live or work in:

e.g Adur District Council:
Wiltshire Council

If outside of England, please specify which part of the United Kingdom and region/s:
-- Please Select (only U.S. / Can / Aus)

33 What is your organisation's name?

e.g organisation name:
Engineering Professors' Council

34 If you are responding on behalf of an organisation, which of the following best describes who/which part of the sector your organisation represents?

Organisation:
Other - If other, please describe your organisation

Other:
Body representing Engineering HE

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