

# **Post-16 Level 3 and Below Pathways**

**TUC response to the government  
consultation**

**January 2026**

## Introduction

The Trades Union Congress (TUC) exists to make the working world a better place for everyone. We bring together more than 5.5 million working people who make up our 47 member unions. We support unions to grow and thrive, and we stand up for everyone who works for a living.

The TUC welcomes the opportunity to respond to the government's consultation on post-16 Level 3 and below pathways. These pathways are essential for providing learners with clear, high-quality progression routes to further study and employment.

They must sit within an ambitious, accessible, and well-coordinated skills system that supports growth in all parts of the country. Reforms must be properly resourced, and aligned with the needs of learners, employers, and the further education (FE) workforce. Below we highlight that there is a real risk that the capacity challenges in FE could hold back delivery of government's objectives unless addressed alongside the roll-out of new qualifications.

Reforms of this scale must prioritise quality, equity, and stability – especially for the initial cohorts of learners subject to the changes. Learners, the tertiary education sector, careers advisors and employers need to be able to understand the new qualifications and be confident that they will be respected and recognised. Drawing on input from our affiliates, the TUC calls for:

- A measured, evidence-based and well-resourced approach to curriculum and qualification changes.
- Retaining choice and fairness for learners by avoiding premature defunding of applied general and vocational qualifications (AGQs).
- Meaningful engagement with trade unions and sector experts to ensure reforms are workable and fair.

## Background and context

Trade unions interest in the skills system is based on the principles that all workers should have access to high-quality lifelong learning opportunities, that the labour market should recognise and value workers' skills, and that a skilled workforce is essential to a productive, growing economy.

Our position is also informed by unions who represent staff in all parts of the education workforce, including FE. The sector faces significant and persistent pressures, including high workloads, recruitment challenges, and funding constraints. Implementation of any reforms must take this context into account.

The TUC broadly welcomes the introduction of V Levels, new Level 2 pathways and the new Level 1 stepping-stone qualification in maths and English. These reforms must not be rushed and should be devised in partnership with the education workforce and wider union movement representing worker/learner voice. Reforms should retain choice, protect equity, and avoid blanket defunding of applied general and vocational qualifications until proven alternatives are in place.

In this response we highlight the risk facing learners during the transition to rolling-out new qualifications. Several unions have warned that removing applied general and vocational qualifications *before* proven alternatives are in place could harm learners. Narrowing pathways to a single vocational route alongside A Levels and T Levels risks reducing choice and flexibility, which could disproportionately disadvantage those who have used BTECs as a stepping stone to higher education in particular. This includes learners from more disadvantaged socio-economic backgrounds, those with SEND and those with lower prior attainment. This could undermine efforts to widen participation and improve social mobility, while placing additional strain on staff tasked with implementing complex reforms at pace.

*“The sector has undergone significant change and churn in relation to qualifications, and so we urge time, caution, consultation, and piloting in relation to any curriculum and qualification changes. Under the last government, we saw far too many reforms that went against the will and expertise of the sector. The rapid introduction of T Levels was the latest example. This, alongside high workloads and levels of stress amongst staff, must be factored into timelines. It is vital that TUC affiliate unions, representing the voice of educators and staff across the sector, are fully engaged in these discussions to ensure that reforms are workable, fair, and support both learners and the workforce.”<sup>1</sup>*

*Quote from a member of a tertiary education trade union*

Several TUC-affiliated trade unions are actively engaged in the Protect Student Choice campaign,<sup>2</sup> a coalition of 30 organisations from across education and employment

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<sup>1</sup> [UCU - Qualifications](#)

<sup>2</sup> [Protect Student Choice - Don't Scrap BTECS](#)

sectors urging the government to reconsider plans to defund Level 3 qualifications. This reflects widespread concern within the FE sector about the possible risks of narrowing post-16 pathways.

We urge government to:

- Engage meaningfully with unions and sector experts before introducing any further changes.
- Ensure Skills England plays a central role in coordinating reforms and fostering collaboration, working with both unions and employers to inform this process.
- Avoid repeating past mistakes by prioritising choice, equity, and stability for learners and staff.

This collaborative approach will help ensure reforms strengthen, rather than destabilise, the education and skills system and ensure that risks facing particular groups of learner are mitigated.

## Consultation questions

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

The TUC support the development of V Levels that will be 360 GLH (the size of one A level) so that V Levels can be combined to provide flexibility. This has the potential to support more learners to combine the most suitable qualifications for their ambitions, and could also support the goal of parity of esteem between academic and vocational qualifications as the distinctions could become less pronounced.

Trade unions have identified some risk that must be addressed to ensure successful implementation of V Levels:

- **Loss of choice:** Replacing the existing wide range of Level 3 vocational and applied general qualifications with V Levels risks the perception that there will be a narrowing in range of options available to learners. Learners and educators need to be confident that the changes are not about limiting choice – including how the new system will deliver where 540 and 720 GLH vocational qualifications are currently or have recently been an option.

Historically, many young people including those with lower GCSE attainment, from disadvantaged backgrounds, or with SEND have benefited from qualifications such as BTECs, which combine practical and academic learning and offer flexible routes to further education or employment. Unions representing the education workforce in particular are concerned that removing or restricting these qualifications could disproportionately penalise these groups and undermine social mobility. It is therefore vital that learners, educators and employers can all be confident in the quality of new qualifications and that there is investment in information, advice and guidance so that learners can make the best choice for their ambitions.

- **Impact on equality:** Some unions are concerned that the proposed reforms risk exacerbating existing inequalities. Learners from more advantaged backgrounds are more likely to navigate transitions and access new pathways, while those from disadvantaged backgrounds may be left with fewer meaningful options. Regional disparities may widen, particularly where FE providers face acute funding and staffing challenges, undermining the principle that all young people should have equal opportunity regardless of geography or background.
- **Sectoral consequences:** Sectors that rely on strong vocational offerings such as health and social care, engineering, creative arts, and digital may lose flexibility if new V Levels or reformed Level 2 pathways do not respond quickly and appropriately to employer and local labour market needs.

### **Workforce Pressures**

- The shift to “V Levels” and reformed Level 2 pathways will likely require substantial curriculum redesign, retraining of staff, and adjustments to assessment and delivery models, especially where “applied learning with practical assessment” is concerned.
- Given the existing strain on FE and 16–19 providers including funding constraints and staff shortages the additional burden of transition risks increased workload, burnout, and negative impacts on staff recruitment, retention, and morale.
- Without sufficiently funded, long-term commitments, the workforce may face job insecurity, uneven workloads, and intensification of work which would undermine both staff well-being and quality of education/training.

We recommend the government work closely with unions, providers, and employers to mitigate these risks through phased implementation, adequate funding, and ongoing consultation.

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

**N/A**

**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?**

The TUC supports the government's commitment to impartial, high-quality information, advice and guidance (IAG) as set out in the updated statutory guidance (May 2025)<sup>3</sup> and the enhanced Gatsby Benchmarks, which align closely with our priorities for fairness, equity, and informed choice in post-16 education.

The benchmarks' emphasis on impartial, high-quality careers guidance ensures that students receive advice free from bias, helping them make decisions that suit their aspirations and needs. We particularly welcome the focus on equal access for all learners, meaningful engagement with employers, and the requirement for qualified careers professionals in every institution. These principles reflect trade union values around social mobility, quality provision, and preparing young people for good jobs.

To strengthen current provision and ensure students are fully informed about subject selection and combinations, the TUC recommends:

- **Guaranteed funding for qualified careers professionals** in every institution to avoid adding pressure to an already stretched workforce.
- **Investment in digital platforms** offering up-to-date labour market information and interactive tools for subject and career planning.
- **Tailored guidance for underrepresented groups**, including SEND learners, to promote equal access and informed choices.

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<sup>3</sup> [Post-16 level 3 and below pathways - GOV.UK](#)

## Introducing new T Levels

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

The following factors should be considered:

- **Collaboration and standards:** Work closely with employers, trade unions, professional bodies, and Skills England to define clear, future-proof occupational standards aligned with national priorities and regional labour market needs. This partnership should draw on the expertise of the FE sector to ensure new T Levels are practical, inclusive, and responsive to workforce realities.
- **Learner pathways:** Guarantee clear progression routes to higher education, apprenticeships, and employment. Develop robust assessment frameworks and curriculum content that uphold parity of esteem with A Levels and existing vocational qualifications, and pilot new T Levels before full rollout.
- **Workforce:** Invest in professional development for FE staff, allowing sufficient time and resources for curriculum planning and upskilling. Provide adequate funding for equipment, facilities, and employer engagement, and address regional disparities to ensure high-quality provision everywhere.
- **Equality:** Design qualifications that are accessible to learners with SEND and those from disadvantaged backgrounds. Avoid narrowing options by removing existing qualifications before proven alternatives are in place.
- **Labour Market Intelligence:** Base decisions on robust evidence of demand for Level 3 skills and consider long-term workforce needs rather than short-term trends.

The TUC recommends that Skills England take a lead role in coordinating the development of new T Levels where no Level 3 occupational standards currently exist. This work must be carried out in close partnership with trade unions and the wider FE sector to ensure reforms are practical, inclusive, and aligned with real labour market needs.

## Level 2 Pathways

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

Transitions should be supported through clear progression routes to Level 3, apprenticeships, and employment; consistent core skills in English, maths, and digital;

and flexibility so learners can switch pathways without penalty. Qualifications must be inclusive, accessible for SEND and disadvantaged learners, and designed in collaboration with Skills England, trade unions, employers and FE providers to reflect labour market needs. Finally, strong impartial careers guidance is essential to help learners make informed choices.

### Foundation Certificate design

**We are proposing that Foundation Certificates are the same size – 240 guided learning hours – to ensure that they are 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?**

While consistency and a one-year study programme have benefits, key risks include:

- **Learner Needs:** Fixed 240 GLH may not suit all learners, especially those with SEND or lower prior attainment flexibility is vital.
- **Depth of Learning:** Limited hours could restrict vocational content and readiness for Level 3.
- **Workload Pressures:** Compressing delivery may increase intensity for staff and learners.
- **Funding:** Adequate resources are needed for enrichment, pastoral support, and Level 3 exposure.
- **Progression and Equity:** Certificates must genuinely support progression and avoid becoming low-value “holding” qualifications.
- **Collaboration:** Skills England should work with unions and FE providers to ensure practicality and inclusion.

**8. Are there any other circumstances you believe would justify a student stepping off the pathway before completing the full 2 years?**

- **Progression to Higher-Level Study:** If a learner demonstrates readiness for Level 4 or higher education before completing the full two years.
- **Health or Wellbeing Needs:** Where personal health, mental wellbeing, or caring responsibilities require a change in study pattern.

- **Relocation or Change in Personal Circumstances:** Moving to a different region or family circumstances that make continuing impractical (although system design should support relocation where requested).
- **Achievement of Career Goals:** If the learner secures a job aligned with their career aspirations and qualification outcomes.
- **Special Educational Needs or Adjustments:** Where an alternative pathway better meets the learner's needs or supports progression.