



Department  
for Education

# **Review of post-16 reforms**

**Process for awarding organisations to notify us when funding approval will be removed due to low or no enrolments**

**7 October 2024**

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## Summary

The [Secretary of State announced a review of post-16 qualification reforms](#) to assess how best to improve the quality of the overall qualifications landscape, support the growth of T Levels, and ensure that all young people and adults have high-quality options that meet their needs.

As part of this review, we are reviewing the level 3 qualifications that are currently in scope to have funding approval removed at post -16, from 1 August 2025. This includes qualifications:

- that overlap with T Levels in waves 1, 2, 3 or 4
- level 3 qualifications that are in scope to have funding approval removed in cycle 1

As part of the first phase of the review, we will continue to remove funding approval from these qualifications, if they have low or no publicly funded enrolments. This will only apply to qualifications due to have funding approval removed for 16-to-19-year-olds and adults and which meet the low and no enrolment definition. This means a low and no enrolment threshold will not apply to qualifications on the wave 3 (except in the engineering and manufacturing route) and 4 T Level overlap lists.

The funding status of the remainder of the qualifications due to have funding approval removed from 1 August 2025 will remain under review.

If a qualification meets the criteria for low and no enrolments, it will continue to have funding removed. If it does not meet the criteria for low and no enrolments, then it may be considered further in the review of qualifications reform which will decide whether it should continue to have funding approval removed or have funding retained for a further period of time.

This guidance sets out:

- how we have identified qualifications with low and no enrolments
- the qualifications in scope of this exercise
- the criteria against which you can notify us that a qualification should not have its funding approval removed due to low or no enrolments and should continue to be considered in the review
- the evidence that you need to provide
- the process and timescales for you to notify us

## Expiry or review date

The guidance document will expire on 31 December 2024.

## Who this publication is for

This guidance is for awarding organisations.

## Main points

### Qualifications in scope of the review with low or no enrolments

Qualifications with low or no enrolments will continue to have funding approval withdrawn from 1 August 2025, for students aged 16 and over.

For qualifications on the low and no enrolment list, you can notify us if the qualification meets one of the following criteria and warrants further consideration as part of the review:

- the qualification has been incorrectly identified as a 'qualification with low or no enrolments'
- there is strong evidence of increased public demand for the qualification
- there is strong evidence of a significant adverse impact if the funding approval is removed from the qualification on students with protected characteristics

For qualifications on the low enrolment list, you can also notify us if there is strong evidence of a significant adverse impact from the removal of funding approval from the qualification, on one of the following:

- providers of education and training
- a subject or occupational sector
- a geographical, local or a devolved authority area

This must be supported by compelling evidence that demonstrates that the criterion is met.

### Submitting notifications

You must notify us by **5:00pm on 1 November 2024**, if you believe a qualification meets the criteria set out in the guidance. If a qualification meets this criteria it could be in scope of the application of further criteria in the review of post 16 qualifications reforms.

We will be accepting notifications through Galaxkey. To be able to set up your access on Galaxkey, we need you to confirm the email addresses of people in your organisation that will need access by **5:00pm on 18 October 2024**.

## Background

As part of the first phase of the review of qualification reforms, we will continue to remove funding approval from qualifications, if they have low or no publicly funded enrolments.

This will be the third time we have run the low and no enrolments exercise to remove funding approval. The definition of low and no enrolments and criteria that you can notify us against is consistent with those we have previously used.

We are starting the notification process on 7 October 2024. This is to allow you time to gather evidence and submit a notification, if you believe a qualification meets the criteria set out in this guidance.

Whilst this notification process for qualifications with low or no enrolments is underway, the review of qualification reforms will continue.

Where a qualification with low or enrolments meets the criteria set out in this guidance, it could be in scope of the application of further criteria in the review.

## Qualifications and enrolments that are in scope

### Qualifications that are in scope

We define a **qualification** to be one that is listed on [Ofqual's Register of Regulated Qualifications](#) with a unique Qualification Number.

The qualifications in scope of this low and no enrolments exercise are level 3 qualifications that are in scope to have post-16 funding approval removed from 1 August 2025.

This includes:

- The [list](#) of level 3 qualifications in scope for funding approval withdrawal in cycle 1 of the qualification reforms
- The lists of qualifications assessed as overlapping with T Levels in:
  - [Waves 1 and 2](#)
  - [Wave 3](#) (only qualifications in the engineering and manufacturing route)

Some qualifications will remain out of scope of this low and no enrolment exercise:

- qualifications on one of the lists of qualifications that are in scope of the review but which are not approved for funding, post 16, in 2024/25
- qualifications on the T Level overlap list for [Waves 1 or 2](#) which were not extended into 2024/25

- qualifications on the [Wave 4](#) T Level overlap list, as these will only have funding approval removed for 16-to-19 year olds
- qualifications on the [Wave 3](#) T Level overlap list apart from those in engineering and manufacturing route, as these will only have funding approval removed for 16 to 19 year olds
- qualifications that in a previous round of low or no enrolments have been retained as there would be an adverse impact on students with protected characteristics, providers of education and training, a subject or occupational sector, a geographical area, local authority or a devolved administration

## Enrolments that are in scope

For this exercise we are defining publicly funded enrolments as only those that are funded through:

- 16 to 19 study programmes
- advanced learner loans
- adult skills fund (ASF)

Publicly funded enrolments that are **out of scope** of this exercise are:

- 14 to 16 (Key Stage 4)
- apprenticeships
- skills boot camps
- those that are funded through other government departments

Although devolved adult skills fund enrolments have been considered as part of this exercise, it will be for the devolved authorities to decide whether removal of funding approval of qualifications with low and no publicly funded enrolments will also apply to devolved funding in their area.

## Definition of low or no enrolments

We are using the following information for this exercise:

- the 16 to 19, level 3 legal entitlement, free courses for jobs and advanced learner loans approval status of these qualifications on the [DfE list of qualifications approved for funding](#) as of 1 August 2024
- the operational status of these qualifications using the [Ofqual Register of Regulated Qualifications](#) as of 1 August 2024
- ILR and school census data for 2020 to 2021, 2021 to 2022 and 2022 to 2023

## **Definition of low enrolment qualifications**

We define a qualification with low publicly funded enrolments as any qualification that is in scope of this exercise and meets all the following criteria:

- at 1 August 2024, it had been operational for 3 years or more (so had an operational start date on or before 31 July 2021)
- at 1 August 2024, it had been approved for funding for 3 years or more (so had an earliest funding approval start date across the post 16 offers in scope of 31 July 2021 or before)
- it had between zero and 99 publicly funded enrolments in each of the 3 funding years, 2020 to 2021, 2021 to 2022 and 2022 to 2023 (but not zero in all 3 years)

## **Definition of no enrolment qualifications**

We define a qualification with no publicly funded enrolments as any qualification that is in scope of this exercise which meets all the following criteria:

- at 1 August 2024, it had been operational for 3 years or more (so had an operational start date on or before 31 July 2021)
- at 1 August 2024, it had been approved for funding for 3 years or more (so had an earliest funding approval start date across the post 16 offers in scope of 31 July 2021 or before)
- it had no publicly funded enrolments across all the offers in each of the 3 funding years 2020 to 2021, 2021 to 2022 and 2022 to 2023

## Criteria against which you can submit a notification

We are now asking you to review the initial lists of low and no enrolment qualifications which will continue to have funding approval removed from 1 August 2025. You must notify us if you believe funding approval should not be withdrawn.

We will only accept notifications from you, as the awarding organisation that offers the qualification. We will not accept notifications from providers of education and training, or others.

Where appropriate, you should consolidate feedback and evidence from users of your qualification and/or other appropriate organisations who support your qualification.

You must provide us with a single notification for each qualification.

## Criteria for notification

You can submit a notification if one or more of the following criteria is met:

- technical error – which applies to both low and no enrolment qualifications
- significant increased demand - which applies to both low and no enrolment qualifications
- potential significant adverse impact on students with protected characteristics - which applies to both low and no enrolment qualifications
- potential significant adverse impact on providers of education and training, a subject or occupational sector, a geographical, a local or devolved authority area - which applies to low enrolments qualifications only

The sections below explain these criteria and the evidence required to support your notification.

### Technical error

This criterion applies to qualifications on both low and no enrolments lists.

You can notify us, if your qualification has incorrectly been [defined](#) as having low and no enrolments because it either:

- has not been operational and approved for three years
- the number of publicly funded enrolments within 16 to 19 study programmes, adult skills fund (includes level 3 legal entitlement and free courses for job) and advanced learner loans for any of the three years is inaccurate



## What you need to do

If you want to notify us on the basis that we have applied the 3-year operational and approved rules incorrectly, you must send us clear evidence that identifies when the qualification was first operationally available and when we first approved it for funding. We will not accept evidence that shows the qualification was approved in one post 16 offer later than another.

The funding approval date will be the earliest date the qualification was approved for funding across all the post 16 funded offers in scope of this exercise (16 to 19, adult skills fund (includes level 3 legal entitlement and free courses for jobs) or advanced learner loans).

If you believe that the number of publicly funded enrolments for any of the 3 years is inaccurate you will need to provide us with evidence that supports this. As part of the definition of low and no enrolments we are only considering enrolments which are funded through 16 to 19 study programmes, adult skills fund and advanced learner loans.

## Significant increase in demand

This criterion applies to qualifications on both low and no enrolments lists.

You can notify us, if your qualification has had an significant increase in [enrolments](#) of 100 or more funded through 16 to 19 study programmes, adult skills fund (includes level 3 legal entitlement and free courses for jobs) or advanced learner loans in 2023/24 or the start of 2024/25.

We will also review all qualifications on the low and no enrolment list against the latest 2023/24 enrolment data. Where the data shows that the qualification has 100 or more enrolments, it could be in scope of application of further criteria in the review.

## What you need to do

You must submit letters from institutions that:

- give details of the institution where the increase has taken place – this must include the full name of the institution and their [UK Provider Reference Number \(UKPRN\)](#)
- are signed by a named person who has the authority to sign on behalf of that institution
- clearly state which qualification the letter relates to, a letter can cover more than one qualification, but it clearly needs to state for each qualification:
  - the qualification title and qualification number
  - in which funding year the increase of enrolments has occurred, for example in 2023/24 or at the start of 2024/25

- which funded offer the enrolments relate to, for example 16 to 19 study programmes, adult skills fund or advanced learner loans
- are from an institution that has a current ESFA funding agreement or a contract with the devolved authority with responsibility for adult education, and delivers provision in England
- show demand of at least 100 enrolments in 2023/24 or start of 2024/25, this demand can be across multiple institutions and must be funded through the 3 funded offers in scope

We will not accept letters where they refer to publicly funded enrolments:

- in traineeships or apprenticeships
- which are funded by other government departments

You can see which institutions are funded by the ESFA using the allocations spreadsheets:

- [19+ allocations sheet](#) shows funding values for institutions that have a contract to deliver the adult skills fund (previously known as adult education budget) or advanced learner loans
- [16 to 19 allocations sheet](#) shows institutions which receive core programme funding

Where an institution is a subcontractor to one of the main institutions on the allocations spreadsheet, also include a letter from the main institution confirming that.

Where an institution is contracted by the devolved authority with responsibility for adult education, also include a letter from the devolved authority confirming that.

You **must not include any individual student data or information** that could result in identification of individual students.

## Potential significant adverse impact on students with protected characteristics

This applies to qualifications on both the low and no enrolments list.

You can notify us, if the removal of funding approval meets all of the following criteria. The removal of funding approval:

- will have a significant adverse impact on a qualification primarily designed or delivered to support specific groups of students who are covered by the protected characteristics of the Equality Act 2010
- there is no other alternative provision at this level in this sector for those students

## Additional requirements for qualifications on the no enrolments list

If the qualification is on the no enrolments list you must clearly explain what you believe the impact to be in the context of the qualification having had no enrolments over the preceding three year period. You must also demonstrate that there are now enrolments or there will be enrolments funded through study programmes, adult skills fund, advanced learner loans.

## Examples of evidence

Removing funding approval for a qualification could prevent people from training as learning practitioners. The learning practitioners specialise in supporting students with protected characteristics such as those with special educational needs and disabilities (SEND). There is no other alternative provision available at this level in this sector.

Other examples could be where withdrawing funding approval would significantly restrict access to education and training opportunities.

## What you need to do

You must submit evidence from yourself and institutions that clearly explains:

- the specific groups of students with protected characteristics that will be affected adversely
- that this specific group of students is funded through 16 to 19 study programmes, adult skills funds or advanced learner loans and therefore not funded through other government departments
- how the students will be affected (for instance what access to support would no longer be available)
- why there is no other appropriate qualification in that sector, at that level which students can alternatively access
- which qualification is impacted – qualification title and qualification number

If the qualification is on the no enrolment list you must also clearly:

- explain what you believe the impact to be in the context of the qualification having had no enrolments over the preceding three-year period.
- evidence using letters from institutions that there is now demand or there will be demand funded through 16 to 19 study programmes, adult skills fund or advanced learner loans in the near future

Letters about demand must meet the same evidence requirements as set out in the [increased demand criteria](#) but do not need to total to 100 enrolments.

You **must not include any individual student data or information** that could result in identification of individual students in the evidence that you submit.

## Potential significant adverse impact on provider

This applies to qualifications on the low enrolment list only.

You can notify us, if the removal of funding approval meets all of the following criteria.

The removal of funding approval:

- will have a significant adverse impact on one or more education and training provider
- there is no other alternative provision at this level, in this sector for the provider

This must be an education and training provider that:

- has a current ESFA funding agreement or a contract with the devolved authority with responsibility for adult education
- delivers provision in England
- funded through 16 to 19 study programmes, adult skills fund and advanced learner loans

The adverse impact could be around potential destabilising a small specialist provider or group of specialist providers, where the qualifications withdrawal of funding approval could result in the provider no longer being able to operate in a viable manner.

## What you need to do

You must submit evidence from yourselves and the impacted institutions that clearly:

- identifies the institution or group of institutions that will be adversely affected
- explains how the institutions will be affected, including the qualification on the low enrolments list that will impact them
- that there are no other appropriate qualifications in that sector at that level which the institution can deliver
- that the institution currently has ESFA funding agreement or a contract with the devolved authority with responsibility to deliver adult education, and delivers provision in England
- that the institution is currently delivering the notified qualification(s) through 16 to 19 study programmes, adult skills fund or advanced learner loans

**You must not include any sensitive institution data or information.**

You can see which institutions are funded by the ESFA using the allocations spreadsheets:

- [19+ allocations sheet](#) shows funding values for institutions that have a contract to deliver the adult skills fund (previously known as the adult education budget) or advanced learner loans

- [16 to 19 allocations sheet](#) shows institutions which receive core programme funding

Where an institution is a subcontractor to one of the main institutions on the allocations spreadsheet, also include a letter from the main institution confirming that.

Where an institution is contracted by the devolved authority, also include a letter from the devolved authority confirming that.

## **Potential significant adverse impact on subject occupational sector**

This applies to qualifications on the low enrolment list only.

You can notify us, if the removal of funding approval meets all of the following criteria. The removal of funding approval:

- will have a significant adverse impact on a subject or occupational sector
- there is no other alternative provision at this level in this subject or sector

## **What you need to do**

You must submit evidence from yourself and sector, employer or professional representative bodies that clearly explains:

- which subjects and/or occupational sectors will be adversely affected
- the purpose the qualification has in that subject and/or occupational area
- what support it has (such as from employers, employer representative groups or professional bodies)
- what outcomes it leads to
- that there is no other appropriate qualification which is meeting the needs of the subject or occupational sector

Where you submit supporting evidence from sector, employers or professional bodies, these organisations must be operating in the sector or occupational area the qualification services or be an organisation that represents the subject of the qualification.

Examples could include:

- a qualification servicing the needs of a small, specialist area where demand is never likely to be high, but it is important that the qualification remains so that training opportunities are there for individuals who wish to access employment in the area
- a qualification in an occupational area reliant on seasonal employment, where demand will be more ad-hoc than consistent
- a qualification in an emerging occupational area, where the demand is not yet clear

## Potential significant adverse impact on geographical area, local or devolved authority

This applies to qualifications on the low enrolment list only.

You can notify us, if the removal of funding approval meets all of the following criteria. The removal of funding approval:

- will have a significant adverse impact in a geographical, local or devolved authority area
- there is no other alternative provision at this level in this sector

### What you need to do

You must submit evidence from yourselves and other institutions that clearly explains:

- which geographical, local or devolved authority area will be adversely affected, and which qualifications are impacting it
- how they will be affected
- that there is no other appropriate qualification in that sector at that level which is meeting the needs of the geographical area, local or devolved authority
- what the purpose is of the qualification in that geographical, local or devolved authority area
- what support it has (for instance is it a key part of a skills strategy or a commissioning strategy)
- what outcomes it leads to and why an alternative, available qualification cannot service the need of students in place of the qualification in scope to have its funding approval withdrawn

Where you submit evidence from a local or devolved authority, it must be specific to the qualification and to the area. For example, if a qualification is serving a specific need in a geographical area, you would need to supply evidence that it is needed, and that removing funding approval would mean that particular provision would be no longer available in that area. Evidence could include local strategies and commissioning plans.

Although devolved adult skills fund enrolments have been considered as part this exercise, it will be for the devolved authority to decide whether removal of funding approval of qualifications with low and no publicly funded enrolments will also apply to devolved funding in their area for adult education.

## Submitting a notification

You must complete a notification form for each qualification and upload the form and supporting evidence into Galaxkey by **5:00pm on 1 November 2024**.

We will not accept late submission of forms, evidence or other supporting information.

You will need to email us, the email addresses of people in your organisation that will need access to Galaxkey by **5:00pm on 18 October 2024**.

You can email us on: [qualifications.approval@education.gov.uk](mailto:qualifications.approval@education.gov.uk).

We need this information to set up your access on Galaxkey. This will not be considered a commitment that you will be submitting a notification.

Once we have received your email, we will send you further guidance on how to use Galaxkey. We recommend that you test using the system ahead of the 1 November deadline for notifications.

Once we have received your notification, we will tell you if we require any further clarification.

We will not consider notifications that do not have supporting evidence.

## **Evidence you need to include**

The [criteria section](#), explains what evidence you need to submit.

In general, your evidence should include a clear statement explaining which criteria you are notifying against and how this criterion is met.

Your evidence may include supporting statements from employers, providers and other representative bodies, local or devolved authorities (as appropriate for the criteria you are applying against).

If you submit supporting statements from employers, providers and other representative bodies they must:

- include the name and address of the organisation
- be signed by a named person who has the authority to sign on behalf of that institution and include details of their position and contact details
- be dated and be recent rather than historical letters of support from when you were first developing the qualification
- be clear about which qualifications it relates to

You may use templates for your evidence but if you do, you must make sure that each piece of evidence is specific to the qualification and the criteria you are notifying us against. Your evidence must be specific about why funding approval for the qualification should not be removed.

Depending on which criteria you are notifying us against, you may also include evidence from local or regional skills strategies, or national strategies. This mostly relates to notifying us against the criteria focussed on adverse impact on a geographical, local or devolved authority area, or others such as being linked to a particular occupational area.

If you include evidence like this, please make sure that you include working links to the relevant strategies and summarise clearly why the strategy you are referencing supports an argument for continued funding approval of your qualification.

## Assessing notifications

We will review all qualifications on the low and no enrolment lists against the latest 2023/24 enrolment data. Where the data shows that the qualification has 100 or more enrolments, it could be in scope of the application of further criteria in the review.

We will review the notifications you submit against the [criteria](#) set out in this guidance. If the qualifications meet the criteria, they could be in scope of the application of further criteria in the review.

As part of the assessment of the notifications, we may also seek further external advice regarding qualifications, if we need to. This could be from an appropriate employer-led body or other representative body.

We will tell you the outcome of your notifications in December 2024.

## Contact us

If you have any queries about the removal of funding approval from qualifications, or about the notification process, please send them to [qualifications.approval@education.gov.uk](mailto:qualifications.approval@education.gov.uk).





Department  
for Education

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