

Design Council submission: Post-16 Level 3 and Below Pathways Consultation

The Design Council are the national champion for the effective use of design for the benefit of the UK economy, society and the environment. In this role, we have an ambition to **upskill 1 million designers in green design skills by 2030, contributing an estimated 73,000 additional green jobs and 10.3bn GVA to the economy annually by 2030**. This movement was endorsed by the Minister for the Creative Industries, Ian Murray, in his keynote speech at World Design Congress in September 2025, a once in a generation showcase of British design and innovation leadership on a global stage.

Design is already a significant contributor to economic growth. The UK's 1.97m strong design economy contributes £97.2bn, growing to £276bn when you include the additional 2.5m people using design skills in their non-design jobs. The design sector has been growing twice as fast as the economy overall but, as with the wider business sector, we need this economic growth to be green.

With **77% of designers working in non-design sectors**, design is not confined to traditional creative industries or digital and technology sectors, but also enhances innovation, productivity, and growth in fields like finance, retail, and construction, and plays a key role in the net-zero transition.

But there is a skills gap. While 71% of designers think the demand for green skills is going to grow, only 43% feel they have the capacity to meet it and **only 50% believe their education has prepared them to design for the planet**.

The forthcoming Creative Industries Skills Audit highlights how skills challenges for the sector are having a significant impact on the design sector including through reducing long-term growth and investment plans. We therefore welcome the government's focus on skills as a key component of delivering growth and breaking down barriers to opportunity and welcome the opportunity to contribute to proposed reforms for Post-16 Level 3 and below pathways.

In order to ensure our response benefitted from the practical insights and real-world experiences of designers, we have engaged our network of Design Council Experts – 250 design pioneers including educators representing the full spectrum of design disciplines, regional and demographic diversity, and skills that are helping accelerate our Design for Planet mission.

Executive Summary

This response sets out the Design Council's evidence-led recommendations on the proposed reforms to Post-16 Level 3 and below pathways. Drawing on insights from our expert network of educators, industry and skills leaders, we outline how V Levels can support growth, innovation and the net-zero transition if designed and implemented effectively. Our recommendations focus on ensuring high-quality provision, equitable access, workforce capacity and a coherent "golden thread" from education into employment, aligned with the Skills for Planet Blueprint.

Recommendation 1: Position design within V Levels as both a cross-cutting capability and a standalone pathway

V Levels should include design in two complementary ways:

- **As a module embedded across multiple Level 3 subjects** (including engineering, digital, construction, health and the green economy), recognising that 77% of designers work outside traditional design roles and that design skills drive innovation, productivity and the net-zero transition across sectors.
- **As a high-quality standalone V Level**, providing a clear pathway for learners who wish to specialise while retaining interdisciplinary breadth.

This dual approach reflects how design skills are used in the real economy and aligns with evidence from the Design Council's expert network and the Skills for Planet Blueprint, which demonstrates that design can be effectively taught both as a distinct discipline and as a foundational, cross-disciplinary capability.

Recommendation 2: Offer design V Levels at medium and large qualification sizes to support high-quality learning and progression

Design V Levels must be available at **medium and large sizes (equivalent to two or three A Levels)**, not limited to small qualifications. Creative and design education depends on sustained, project-based learning, portfolio development and iterative practice, all of which are undermined by small qualification sizes.

Restricting V Levels to small sizes risks fragmenting learning, forcing providers to withdraw successful existing creative qualifications, and weakening progression into higher education and industry.

This recommendation aligns with findings from the Curriculum and Assessment Review and reflects the non-linear nature of design careers, where adaptability and transferable skills are essential.

Recommendation 3: Ensure equitable national provision to avoid a postcode lottery in design education

Design V Levels must be **available consistently across all regions**, to prevent further geographical disparities in access to creative and technical education. Without clear expectations for national coverage, V Levels risk reinforcing an existing postcode lottery and undermining ambitions for inclusive regional growth.

A coordinated delivery model – for example through **Regional Green Growth Hubs** bringing together colleges, employers, higher education and cultural organisations – would help ensure high-quality provision, shared resources, and meaningful industry engagement nationwide.

Recommendation 4: Address teacher supply, expertise and industry connection as a prerequisite for successful reform

The viability of design within V Levels depends on tackling long-standing challenges in **teacher recruitment, retention, subject expertise and industry currency**, which also affect GCSE and Level 2 provision.

Government should:

- Implement the recommendations set out in *A Blueprint for Renewal: Design and Technology Education*
- Invest in funded CPD, industry secondments and collaborative teaching models
- Enable teachers to work with practising designers and employers, ensuring learners are exposed to contemporary industry practice, emerging technologies and real-world problem solving

Without action on workforce capacity, the quality and credibility of new V Levels will be at risk.

Recommendation 5: Embed a clear “golden thread” from school to work using the Skills for Planet Blueprint

V Levels must sit within a **coherent education and skills pathway**, aligned with GCSEs, Level 2 provision, higher education and employment. Reform should reinforce continuity rather than create structural breaks in the pipeline, particularly for creative subjects.

The Design Council’s **Skills for Planet Blueprint** provides a proven, sector-endorsed framework for achieving this golden thread. Co-created with experts across government, education and industry, and already being adopted by schools, colleges, universities and employers, it offers a practical mechanism to ensure consistency, progression and relevance across the skills ecosystem.

V Levels

The Design Council welcomes the government’s ambition to strengthen Post-16 vocational and technical pathways. From a design perspective, the proposed introduction of V Levels presents an exciting opportunity to establish clearer pathways into work, particularly given the widespread use of design skills across non-design sectors such as engineering, health, digital, manufacturing and the green economy.

Handled correctly, V Levels could support a more resilient, innovative and inclusive design economy. However, if poorly designed, they risk being unfit for purpose, exacerbating existing inequalities, and weakening the very skills that the UK needs for the future.

Design is not a narrow occupational skillset but a foundational capability that supports innovation, problem-solving, systems thinking and sustainability. The ability to study design alongside A Levels or T Levels could enable learners to combine creative, technical and academic strengths, equipping them with skills that are increasingly essential across the economy. The Kingston University Future Skills reports¹ consistently evidence that “human-centric skills” such as creative problem solving and critical thinking are most valued by industry to drive innovation and boost economic growth.

However, while we recognise this potential, there are significant concerns about how V Levels may operate in practice. Without careful design and implementation, there is a

¹ [Kingston University Future Skills Report 2025 | Kingston University London](#)

real risk that reforms could narrow access to creative education, weaken progression routes, and exacerbate existing inequalities.

The role of design within V Levels

The Design Council recognises that the Department for Education has referenced design as being a potential V Level subject area. When considering the practicality of this, our expert network shared their views on how design should be positioned within the proposed V Level framework.

From this feedback, **it is our recommendation that design should be included in V Levels in two ways:**

1. **As a module embedded across multiple Level 3 subjects** (e.g., engineering, digital, construction, health and green economy), supporting interdisciplinary learning, problem-solving and co-creation approaches.
2. **As a high-quality standalone V Level**, offering a coherent pathway for learners who wish to specialise while retaining breadth across disciplines. A well-designed V Level could support progression into a wide range of creative and design-related careers and further study

Both models have value, reinforcing the need for flexibility and meaningful engagement with educators, industry and learners to ensure that V Levels reflect the diverse ways design skills are developed and applied in the real world.

This perspective is informed by **Design Council's Skills for Planet Blueprint, which sets out the critical cross disciplinary green design skills that all designers need**. Co-created with over 100 design experts across government, education, and industry and endorsed by key bodies and businesses including AHRC, CHEAD, Innovate UK and RCA, it provides a foundational understanding in what is needed to make regenerative design the default, not the exception and is already being embedded across industry and education providers.

Over 350 organisations actively support the Skills for Planet movement, with several organisations committed to embedding the Blueprint, including Frog (Capgemini), Innovate UK Business Connect and Panasonic. In higher education, 15 leading universities have committed to embedding the Blueprint, with institutions such as Bath Spa University and the Royal College of Art already teaching courses aligned to it. In schools and colleges, we distributed Design for Planet resources to 22,000 teachers as part of Creative Careers Month, supporting the integration of design skills across subjects rather than confining them to a single pathway.

This growing adoption across education and industry demonstrates that design skills can be effectively developed both as a distinct discipline and as a cross-cutting capability, and underlines the importance of exploring both models as part of careful, evidence-led Level 3 reform. It also demonstrates the importance of engaging across the skills ecosystem from schools and higher education to industry and government ensuring a coherent education and skills pathway.

In line with this approach, the Curriculum and Assessment Review and the post-16 qualifications strategy must speak to one another. Learners should experience a coherent pathway from school through to post-16 education, higher education and employment.

If creative subjects are valued and encouraged at earlier stages but become harder to access or sustain post-16, this creates a structural break in the pipeline. V Levels must therefore be designed as part of an integrated system, rather than as isolated qualifications.

Qualification size and the risk of narrowing provision

We are concerned that the government’s preference for implementing V Levels only at a small size equivalent to a single A Level would introduce logistical complexity, suppress uptake, and harm progression to higher education and industry.

Creative and design education often relies on sustained, project-based learning, portfolio development and iterative practice. Limiting V Levels to small qualifications risks fragmenting this learning and encouraging providers to withdraw medium and large creative qualifications (equivalent to two or three A Levels) that currently play a vital role in vocational progression. It also runs contrary to the findings of the Curriculum and Assessment Review which concluded that *“In addition to small qualifications, we also see the need for V Levels in large qualification sizes in some vocational and creative areas where there are no T Levels.”*²

If this approach continues, providers may be forced to scrap well-established and successful programmes, significantly reducing access to industry-facing creative education and damaging progression to both higher education and employment.

While V Levels aim to support direct progression into work, the Design Council is concerned that an overly narrow focus on occupational skills could limit the development of transferable creative capabilities and the ability to adapt to technological and sectoral change.

Creative careers are rarely linear. Many practitioners move horizontally between roles, disciplines and sub-sectors, and increasingly need to adapt to emerging technologies and future modes of work. Design education must therefore balance specificity with adaptability.

In some parts of the creative industries more focused pathways may be appropriate. In others, particularly those driven by rapid innovation, broader creative education is essential. V Levels must reflect this diversity rather than imposing narrow occupational definitions across the board.

It is therefore our recommendation that V Levels should be available in medium and large sizes (equivalent to two or three A Levels) to support sustained, project-based learning and progression to higher education and employment. Limiting them to small qualifications risks fragmentation and withdrawal of successful existing programmes.

Access, equity and maintenance support

There remains uncertainty about eligibility for maintenance support for creative subjects. Where financial support is unavailable or unclear, learners from lower socio-

²https://assets.publishing.service.gov.uk/media/690b96bbc22e4ed8b051854d/Curriculum_and_Assessment_Review_final_report_-_Building_a_world-class_curriculum_for_all.pdf

economic backgrounds may be pressured to choose alternative qualifications that offer greater financial security, regardless of their aptitude or aspirations.

This risks undermining equity and diversity within design and the wider creative industries, which already face persistent challenges in representation. V Levels should remove barriers to access, not reinforce them, and **maintenance support must be available to align with the government's ambition to widen participation.**

Loss of successful existing qualifications

The Design Council is concerned about the potential loss of existing vocational qualifications that are already delivering strong outcomes for learners and employers. Creative education is not uniform across the country, and different regions and sectors have distinct needs.

A transition to V Levels must recognise this diversity. **New pathways should build on what works, rather than replacing proven qualifications prematurely.** A one-size-fits-all approach risks destabilising provision and reducing learner choice.

Geographical disparities and the risk of a postcode lottery

There are already significant disparities in access to creative and technical education across the country. Not all institutions currently offer T Levels, and it remains unclear whether V Levels will be available consistently nationwide.

Without a requirement for broad provision, V Levels risk becoming another postcode lottery, further entrenching regional inequalities. **To support regional and inclusive growth, there must be equitable access to creative and design pathways across all areas.**

To facilitate regional growth, the Design Council have recently rolled out **Regional Green Growth Hubs**, which build regional design skills through locally tailored partnerships between education providers, businesses and designers. These hubs support the upskilling of local design communities and strengthen regional creative ecosystems in line with local economic and environmental priorities.

The Regional Green Growth Hubs provide a practical model for delivering V Levels consistently across regions while remaining responsive to local labour markets. By convening providers, employers and higher education partners, the hubs support industry engagement, curriculum relevance and teacher access to current practice, helping to address risks around regional inequality, workforce capacity and progression. They also help embed a coherent golden thread from education into employment, aligned to the Skills for Planet Blueprint.

New T Levels

The Design Council agrees that T Levels are, in principle, a strong and valuable offer for learners who have a clear understanding of the career they wish to pursue and who want to focus intensively on a single technical subject area. For these learners, T Levels can provide a clear route into skilled employment, apprenticeships and further study.

From a design perspective, T Levels have particular potential where they successfully combine hands-on making and technical practice with design thinking, problem-solving and applied creativity. In areas such as digital, engineering, construction and

manufacturing, this integration can support the development of design skills that are essential across the wider economy.

However, while we support the continued development of T Levels in principle, there are some concerns about the effectiveness of the proposed new T Levels.

Access, availability and geographical coverage

A consistent message from design educators and providers is that T Levels are not currently available everywhere. Provision remains uneven across the country, creating geographical disparities in access to technical and design education.

The Design Council is concerned that creating new T Levels without first addressing these structural access issues risks exacerbating a postcode lottery, where learners' opportunities are determined by where they live rather than their interests or potential. This runs counter to ambitions around regional growth and inclusive access to skills.

Alongside considering expanding the range of T Levels, it is therefore vital that:

- Existing T Levels are available more consistently across regions
- Providers are supported to deliver them sustainably
- Learners nationwide can realistically access new pathways

Teacher capacity, expertise and workforce challenges

A major unresolved issue raised by the sector relates to teacher supply and subject expertise, which is critical to the success of any new T Levels.

Design and technical education often requires educators who combine pedagogical skill with current or recent industry experience. Many providers report difficulties recruiting staff with the specialist knowledge needed to deliver high-quality technical and design education, particularly in rapidly evolving fields.

We are concerned that:

- Many teachers delivering technical and creative subjects do not have sufficient industry or specialist expertise
- There is limited clarity on how new T Levels will be staffed at scale
- Teacher shortages could undermine the quality and credibility of new qualifications

These concerns are equally relevant to proposed V Levels, and point to a wider systemic issue that must be addressed alongside qualification reform.

In addressing this, **we would urge government to enact the recommendations set out in *A Blueprint for Renewal: Design and Technology Education*³**. These recommendations were developed and supported by over 20 organisations representing industry and education providers. It outlined the urgent need for tangible

³ [A Blueprint for Renewal Design and Technology Education by Design Council - Issuu](#)

interventions to support the teaching profession through a funded strategy for recruitment, training, CPD and retention.

This would stabilise the teaching workforce which has witnessed an alarming fall in numbers as well as upskilling teachers so they can offer an excellent education. To ensure that teaching is meeting the current and future needs of industry, teacher budgets for industry and community collaborative teaching should be piloted, enabling teachers to become curators of knowledge, and bringing practicing designers into the classroom to teach specialist subjects.

Teachers from all subjects should also be supported to access sector-led initiatives that enrich and pioneer new approaches to design-led learning.

Quality and consistency of delivery

The success of T Levels depends not just on their design, but on the quality and consistency of delivery. Expanding T Levels too quickly, without addressing workforce capacity and professional development, risks creating qualifications that vary significantly in quality between institutions.

For design-related T Levels in particular, learners need exposure to:

- Contemporary industry practice
- Emerging technologies and tools
- Real-world problem solving and project-based learning

Without sufficient investment in staff development and industry engagement, new T Levels may struggle to meet these expectations.

Design Council supports the continued development of T Levels as a high-quality technical route for learners who are ready to specialise and progress directly into work or further study. For design skills in particular, T Levels can offer a powerful combination of practical experience and applied creative thinking.

However, creating new T Levels without resolving fundamental issues around access, teacher capacity and delivery quality risks undermining their effectiveness and credibility. Addressing these systemic challenges is essential if T Levels are to fulfil their promise as a cornerstone of the post-16 education system.

Level 2 Pathways

Level 2 pathways are a foundational part of the post-16 system and should be treated as such in the government's reforms. Strong, flexible and well-funded Level 2 provision is essential to widening participation, supporting progression and ensuring that reforms at Level 3 deliver equitable outcomes.

The Design Council believes it is important to address Level 2 pathways within the post-16 reforms, as they play a crucial role in supporting access, confidence-building and progression into Level 3 study and employment.

Level 2 qualifications often serve learners who are not yet ready to specialise, who need to rebuild confidence following GCSEs, or who benefit from more applied and practical learning. For many young people, especially those from lower socio-

economic backgrounds or with SEND, Level 2 provides a vital bridge rather than a terminal qualification.

Preparation for progression, not premature specialisation

The Design Council does not believe Level 2 should mirror Level 3 in terms of narrow occupational focus. At this stage, our design experts were of the firm view that learners benefit from:

- Broad exposure to creative and technical skills
- Development of foundational design capabilities such as problem-solving, collaboration and making
- Opportunities to explore interests before committing to a specific pathway

Over-specialisation at Level 2 could limit progression, particularly in design, where careers are rarely linear and transferable skills are essential.

Individual Study Programmes

We note the proposals within the Level 2 pathways for students to take their own study programmes, intended to better meet the needs of learners and focus on preparing them for the next stage. While the intention is welcome, **design educators and colleagues across the creative sector have expressed concern about the practical feasibility and the potential for weaker educational coherence.**

In particular:

- There are serious questions about capacity, including whether providers have sufficient staffing, time and resource to develop and manage individual study programmes at scale.
- Without clear structure, personalised plans risk fragmenting provision, leading to inconsistent learner experiences and outcomes.
- Excessive individualisation may weaken peer learning, cohort identity and shared creative practice, which are particularly important in design education.

Therefore any personalised approach at Level 2 must be:

- Structured and scaffolded, rather than wholly bespoke
- Designed around coherent pathways with flexibility at the margins, not entirely individualised programmes
- Supported by clear guidance, workforce development and funding

Without this, there is a risk that well-intentioned personalisation could undermine quality, equity and progression.

Transition and branding

The transition to a reformed post-16 system, including the introduction of new V Levels and the expansion of T Levels, will be as critical to success as the qualifications themselves. Reform of this scale will need to be well designed, carefully phased and

adequately funded in order to avoid disadvantaging learners, destabilising providers, or undermining confidence in vocational and technical education.

If transition is rushed or poorly managed, there is a significant risk that reforms will fail to achieve their stated aims and instead reduce access, narrow choice and weaken progression into employment and further study. It will be vital to ensure that learners are not caught between systems, losing access to well-established and successful qualifications before new routes are fully available and proven.

Educational providers will also require sufficient time and support to adapt. Colleges and training providers are already operating under significant financial and staffing pressures, and rapid reform risks reducing their ability to deliver high-quality, consistent provision. Transition must therefore be designed to protect learner outcomes, provider stability and workforce morale.

Addressing structural issues alongside transition

As previously set out, the transition to new qualifications cannot be considered in isolation from wider structural challenges in the system. In particular:

- Teacher supply, quality and professional development are persistent challenges, particularly in design and technical subjects where industry expertise is critical.
- Geographic access remains uneven, with significant variation in the availability and quality of provision across the country.
- Providers need time, funding and support to recruit, retain and upskill staff to deliver new qualifications effectively.

Transition planning must explicitly address these issues, rather than assuming they will resolve themselves once new qualifications are introduced.

The need for a “golden thread” from education into employment

The Design Council strongly supports the creation of a golden thread through education, from early curriculum choices, through post-16 pathways, into higher education and employment.

Reform should reinforce continuity rather than fragmentation. Learners should be able to see how choices made at Key Stage 4 connect meaningfully to post-16 study, and how post-16 qualifications connect to real opportunities in work and further learning. This is particularly important for creative subjects, where skills are widely applied across sectors and careers are often non-linear.

Without this coherence, there is a risk that reforms create confusion rather than clarity for learners, educators and employers. This consistency should be developed using the **Design Council’s Skills for Planet Blueprint** which has been co-created with design experts across government, education, and industry and is already being adopted across the skills ecosystem, from schools and higher education to industry and government.

Employer engagement and reform fatigue

Employers are essential partners in the success of vocational and technical education. However, many employers – including those in the design and creative sectors – are

experiencing reform fatigue following successive changes to apprenticeships, T Levels and funding models.

Without sustained employer buy-in, new qualifications risk becoming misaligned with industry needs or overly burdensome to support in practice. Engagement should focus not only on immediate occupational skills, but also on the broader capabilities – such as creative problem-solving, adaptability and systems thinking – that employers consistently value as evidenced in the Kingston University Future Skills reports.