

Consultation on the Implementation of T level programmes Response of the Association of School and College Leaders

Please note the response was completed online which means that the question numbers do not correspond with the question numbers in the consultation document.

Q5 Do you agree that the principles outlined above are the right ones on which to base a review of level 3 qualifications we should continue to fund in the new system, alongside T levels and A levels?

ASCL broadly agrees with the principles behind the review, particularly those of raising the esteem of technical qualifications, removing poor quality provision and simplifying the system for stakeholders such as employers and parents. However we do have concerns over "The wider qualifications offer at level 3" section. Here the review states it is to "consider" the role of applied general qualifications (AGQs) and indicates the three key principles necessary to continue funding them - we would add a fourth i.e. that the qualifications should have widespread acceptability, confidence and brand awareness by employers and other stakeholders - the AGQs fit these criteria so we would expect them to remain (the way that AGQs maximise student options for progression is also very important).

We also agree that those qualifications that attract funding should represent "value for money". However we are concerned about what criteria and benchmarks would be used to define this and would expect there to be a consultation and agreement on this with the profession.

Q6 Do you agree that we should review qualifications at level 2 and below based on the principles that these qualifications should support progression into employment or higher level study and have a value in their own right alongside T levels?

ASCL believes the three principles as defined in the consultation are valid but would add a further one around the design of these qualifications.

Qualifications below level 3 should be demand-led and based on local need as identified by local schools and colleges, in conjunction with local employers where possible. Flexibility in design should be a key feature and local schools/colleges should be allowed to flex qualifications to suit their students' needs, based on whatever skills deficits or particular needs apply. We understand that this approach may appear to conflict with a perception of national rigour, consistency and simplicity, but these students, by definition, have tended to underperform in national tests such as GCSEs, so a different approach is needed. Trust should be shown in the teaching profession to co-design these qualifications locally, overseen by a national system of verification and quality control. Progression should be the key feature of these qualifications and local flexibility to prioritise content to address students' specific skills deficits is essential.

Q7 Do you agree with the proposed approach to assessing technical qualifications?

ASCL agrees with the seven general assessment principles. In addition we agree with a compensatory assessment approach of the two core elements and a defined minimum for each part. We also agree with the principle of having different assessment methods for each of the two core elements, one set by the Awarding Organisation (AO) and one project/practical based set in conjunction with the employer. However it is imperative that the

AOs do not just default to a written examination for the external core without considering other forms of external assessment, which reflect that T levels are genuinely testing other skills apart from traditional academic ones.

We do not have a strong view on whether one part of the core should be synoptic in its design as the work placement should provide this.

Q8 Do you agree with the approach to grading technical qualification components?

The proposal is to use different forms of grades for the core and specialisms, so that a typical student's T level certificate may show B, Merit, Pass (B for the core, and Merit and Pass for two specialisms). Some students may of course have only one, or indeed 3+ specialism grades. This could be confusing to employers, students and parents.

A simpler system may be to show three grades - one for the core external assessment, one for the core internally assessed project and one for the average of the specialisms. All should be graded using the A*-E system. This would mean that a student would achieve three grades e.g. B, C, D which gives more comparability to the traditional A level system. This would help towards external perception of parity of esteem.

In addition the move away from the Distinction/Merit/Pass system gives more room for distribution of grades rather than the clustering around one grade, which has led to the present grade inflation towards a Distinction grade being the national average for AGQs.

We understand this is very different to the proposal but this is important to the success of T levels in terms of understanding, comparability and progression and should therefore warrant more consideration and consultation with the profession and employers.

Q9 Do you agree with the approach to maintaining comparable standards of performance for technical qualifications?

The association agrees with the principle in broad terms in order to ensure consistency between individual T levels, and indeed over time. However due care must be given to how the system allows for improvement over time, which has proved difficult to measure and understand with the use of comparable outcomes in GCSEs, GCEs and other existing qualifications.

Q10 Do you agree that prior attainment of the core could count if students switch to another T level within the same route?

We agree with the principle that where the content is broadly the same within a route then students should be able to use prior attainment of this to transfer to another pathway within that route.

However to increase flexibility further and avoid the high stakes impact of choosing the "wrong" route, we would suggest the establishment of "top-up" assessments to enable students to access more alternative cores, and thereby transfer pathways.

We also agree with the proposal to allow re-sits and that the higher mark counts.

Q11 Do you agree with the proposed approach integrating the work placement within the T level programme?

ASCL believes that work placements are what truly differentiates T levels from previous vocational initiatives. This needs to be successfully managed if T levels are to succeed. We are concerned that employers may not have the ability to cope with the quantity and demands of numerous work placements. To this end we would like to see successful paid part-time employment count in exceptional circumstances in order to allow maximum opportunity for students to successfully pass their work component. Rules as to the

maximum number of days, having a valid employer testimonial etc. would of course need to be in place. We do not see this as a dumbing-down in the quality or relevance of work placements. Students who successfully combine part-time jobs with their studies typically show more resilience and life skills than their peers and this is often the only way that more disadvantaged students can stay on in full-time education and training, and is generally welcomed by employers.

Q12 Do you agree with the proposed method of appraising the student's performance on their work placement, including the Employer Reference?

We agree with the principle that the provider determines the overall success of the work placement (as opposed to the employer) and with a template-based reference to be provided by the employer.

It is also right that the student has a right of appeal to an external body such as the IfA, although the criteria for this need to be agreed with educational representatives in a separate consultation.

Q13 Do you agree with the proposed approach to quality assurance set out above?

ASCL agrees with the QA arrangements but would recommend that the student log-book is designed in an online web-based form. This would enable all stakeholders to access and contribute as well as providing evidence towards digital skills.

Employers' public liability and/or other forms of insurance necessary for the safety of the student should be made as easy as possible for small employers to access – some sort of national government regulated/backed scheme would certainly be beneficial and may encourage smaller employers to participate.

Q14 What additional support or further modifications should be available to those with greater needs or special circumstances (such as caring responsibilities) during a work placement?

Employers and providers need to ensure flexibility, where possible, in the design of the work placement, whilst at the same time ensuring the rigorous standards of being in employment are met. Ultimately the provider should be the arbiter of whether absences or special arrangements are justified for students in special circumstances.

Additional funding should be available to be drawn down on a case-by-case basis for additional individual support, as per the existing system for post-16 EHCPs.

Q15 How can we support students to access work placements relevant to their course in areas where there are no employers to offer work placements nearby?

This is a difficult high stakes area to manage, especially as students who do not pass the work placement will not pass overall. However we recognise it is not practical or financially viable to fund all students who may want to travel long distances to access work placements. It is therefore important that other vocational programmes such as AGQs remain available to allow students to experience particular occupational areas.

Q16 Do you agree with our suggested approach to providing students with financial support whilst on a work placement?

In general ASCL agrees with allowing employers to provide payment if they so wish. However it must be clear that the provider's quality control of the work placement is not compromised by an employer paying a student to perform tasks outside of the standards, or below the necessary level, in order to take advantage of cheap labour (particularly as the student may actually be happy to do this).

There should also be national consistency as to minimum payments to students – no students should be required to pay for their travel or meals just because they live in a different part of the country. No form of means-testing or other arrangement should apply to this element of the T levels.

Our **preferred model** though would be a form of EMA (“Employment Maintenance Allowance” perhaps?) which would be paid to all eligible students whilst they are undertaking the work placement. This would help ensure that students are not tempted to pursue part-time paid employment rather than undertake a work placement. It would also help T levels attract students and would help with attendance and punctuality if the “EMA” was dependent on this. Our view would be that employers can top this up if they wish. It should also be as admin-free and as minimal a bureaucratic burden on the provider as possible.

Q17 What are the common barriers/challenges for employers to host work placements and how can we support employers to offer work placements?

There are a number of well documented barriers to providing work experience including disruption to existing work practice, customer facing issues, insurance, security, safety and confidentiality issues. These and other issues may be described as *work-based barriers*.

However there are also other *pastoral-based barriers* such as a lack of training for employers to deal with students’ behavioural, cultural and religious issues which providers are experienced at doing. Mutual training programmes between providers and employers should be a pre-requisite but must not be over-bureaucratized or inflexible which would risk discouraging employers.

Q18 How do these challenges vary across industries and location types?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q19 How can the range of employers, including SMEs, be better supported to offer work placements for students with additional needs?

Additional training and more regular meetings between the employers and providers will be necessary when there are students with higher needs. More funding needs to be available to support this additional requirement.

Q20 Would employers value a recognition in delivering work placements, for example through a form of 'kitemarking'?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q21 Should students be able to opt to take a higher level maths qualification e.g. core maths, A levels maths or work towards higher grades in GCSE even if T level panels do not require it? What are the issues for providers in delivering this?

There are two components to the area of maths and English. Firstly, ASCL disagrees that students need to achieve a minimum standard in order to achieve an overall T level pass. This is not the case with A levels and proper parity of esteem should mean the same standards apply. We agree that students should be required to continue with maths /English where they have not yet achieved level 2. However employers are able to see the level of student achievement in maths/English to date and they may judge their compensatory skills to be adequate where either maths or English is still not yet achieved. To prevent some students from achieving the overall T level qualification because they are exam-phobic towards maths for example is unnecessary.

Secondly, where students want to continue to higher levels of maths or English this should be allowed but there must be a recognition that this means extra workload for the students and may not be possible for the provider to timetable. It is far better that the technical qualifications embed the appropriate level of maths/English inside the qualification itself

rather than rely on add-ons, or indeed have the IfA setting higher maths/English requirements.

Q22 Which of these options for funding Maths and English within the T level programme do you think would be the most appropriate?

We believe that as a default position all students studying on a T level programme should be funded for a minimum number of hours e.g. 1000. Those re-sitting maths/English could either do this as extra classes on top of the 1000 hours if they had the ability and time management skills, or do it as part of their 1000 hours. Those students not re-sitting maths/English may well take an additional specialism or qualification (such as core maths). Flexibility needs to be left to the provider and the student, as it is at the moment on Study Programmes.

Q23 Where there are additional occupation- specific requirements that can be delivered or assessed off the job, do you agree that these should be incorporated into T levels?

Yes. As per previous answer, all qualifications should be built into the Study Programme.

Q24 Do you agree with the information we propose to include in the certificate?

Please see answer to Q8.

In addition we believe that the individual grades for maths/English components do **not** need to be shown on an overarching certificate. This is not the practice for academic study programme certification and we should be trying to show consistency and parity wherever possible. However if the idea of an over-arching certificate for academic study programmes, such as an “English Baccalaureate” concept, was introduced at the same time, we may review our position on this.

Q25 Do you agree that partial attainment should be reflected in the proposed transcript?

Notwithstanding answer above – Yes

Q26 How can T levels be designed in a way that enables students to progress onto apprenticeships?

Progression from T levels is crucial and early adopters must see the progression paths on offer before they start a T level programme. T level “graduates” should be able to progress on to level 2 apprenticeships if they have decided that their T level occupational area was not for them.

If they are partially successful then, in addition to accessing level 2 if they wanted, they should also be able to retake all elements of the T level as they need to i.e. the external or internal core, specialism or work placement. This could be done by infilling to a following cohort and they should be funded as a part-time student, perhaps whilst they are also working part-time.

Where T level graduates want to progress to a level 4 apprenticeship in the same pathway then this must be allowed. Any additional workplace skills necessary to bring them up to the equivalent of level 3 apprentices should be identified before the commencement of the T level, with suggested time frame for completion e.g. “It is expected that successful T level students will need an additional 3 month on the job training period prior to starting a level 4 apprenticeship in the following pathway...”.

Q27 How can T levels be built to provide a solid grounding for, and access to higher levels of technical education?

To provide for maximum progression the core, specialisms and related assessment methods must be similar to those that would be encountered in higher technical levels (4+) levels.

Q28 What good practice already exists in enabling learners with technical (rather than academic) backgrounds gain access to, and succeed on, degree courses?

Progression to more traditional degrees should be available where students realise that their interests lie in this direction (possibly because of their preference for a particular assessment method or aspect of the T level programme). In most cases students should be able to “transfer” via a one year foundation year onto a degree in a similar academic discipline. HE institutions should be able to interview/test other T level students if they seek direct entry, as appropriate to their degree choice. The relevance of the existing Access programmes also need to be considered.

However we feel that it is important that T levels are not marketed as offering all things to all people. Instead, T levels are promoted primarily for those wanting to build their skills and career through work and practical training, not through academic study.

Q29 What support should we consider as part of a transition offer to ensure that students can progress to level 3 study and particularly T levels?

We welcome the transition year with the focus on delivering core areas but with flexibility between providers at its heart. Local providers must be trusted to provide the appropriate support programmes and further consultation on accountability measures for this transition year needs to be undertaken in due course.

Q30 How should we adapt T levels for adults so that they meet the needs of adult learners?

If adult learners have minimal work experience in an occupational area then they should follow the T level programme as is. Where they have substantial work experience in the relevant sector there needs to be a system of accreditation of prior learning (APL) adopted.

Q31 What do you think the biggest challenge will be for providers in delivering new T levels and what additional support do you think providers will need?

ASCL believes the three areas that have been identified i.e. facilities, equipment and appropriately trained staff are crucial. However support in working with new and existing employers is also of critical importance. Some providers have well-established relationships but others do not – sometimes because few relevant employers operate locally. If this latter issue is not addressed there is a significant risk that huge swathes of young people across the country will not be able to pass their T level qualification.

Q32 What information do you think will need to be provided to be able to market T levels effectively to students and parents and how far in advance of first teaching will it be needed?

ASCL believes that school and college leaders are crucial in being able to successfully market T levels. Many such leaders remember the failure of the 14-19 diplomas ten years ago, and are naturally wary of advising young people to take what may seem a similar path. Not enough has been done to engage the school sector with the design and implementation of T levels – the absence of any school sector representation on the national advisory board is a mistake. If school leaders do not get behind T levels and advise parents and young people appropriately, then demand will suffer greatly. Students presently in year 9 will be on the first pilot programmes in 2020 – this is much nearer than seems to be recognised, particularly as students often start looking at their options in year 8.

Q33 How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching and training other members of staff?

This varies greatly between institutions and depends on the type of qualification and both the availability and willingness of local employers.

Q34 What challenges will providers face if they want to bring in more industry expertise?

Schools and colleges have always had differing levels of success with integrating “industry professionals” into the delivery of programmes, particularly where the role is less hands-on/practical instruction and more of a classroom-led/teaching role. The level of training needed for work-based practitioners is high, in order to get them to fit in to existing college or school practice, as well as practical difficulties such as fitting in odd hours into timetables. In addition the marking and ongoing assessment often proves too challenging or time-consuming for many. Rates of hourly pay do not seem adequate to many who are working in the occupational areas.

A more successful approach has often seen the provider’s own staff being given time to refresh their skills and knowledge in the workplace and bringing that expertise back to their teaching, perhaps in conjunction with somebody in the workplace who can advise them on latest technical developments i.e. the idea of having a “workplace buddy”.

Q35 Should we seek to further influence which T levels are offered by providers, according to local and national skills needs?

Providers should not be further influenced at this stage. If it becomes clear that there are serious “cold spots” for provision of some of the T levels then perhaps some form of financial or other incentives can be considered – but this should be done through local consultation with all providers.

Q36 How do providers currently take account of local and national skills needs when planning their provision and how do they work with the existing structures that have responsibility for local skills planning?

Most providers regularly use LMI (often provide by the local LEP) in their curriculum planning. Most also work with employer representative bodies such as CBI and the Chamber of Commerce to receive updated and ongoing LMI.

Q37 What additional support will providers need to ensure that T levels meet local skills priorities?

Providers are very experienced and able to deliver relevant demand-led programmes providing they have the right resources and staffing. However the high stakes pass/fail of the overall T level programme, with a pass requiring a successful work placement, may deter some from entering the market. Therefore the most important additional support may be around this issue, which is difficult to influence. This leads to a further related point that where it is not possible to offer a T level in an occupational area because of a lack of local employers, then alternative vocational qualifications in that occupational sector must be available – e.g. AGQs. Otherwise large numbers of young people will be being denied to explore opportunities that might be right for them.

Q38 What material could reasonably be included under the copyright of a technical qualification? Are there any other steps that we could take, within the parameters of the legislation, that would allow this to operate effectively and in everyone's interests?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q39 How can the above mechanisms (i.e. licence length, lotting and transferability) be used to help AOs recover their investment, maintain appropriate profit margins but also keep the market competitive for future re-procurements?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q40 When contracts are re-procured, what would be needed over and above the licensed copyright to submit a competitive bid? How will AOs keep their skills levels up to maintain their capability to bid in future re-procurements?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q41 Are there other variables (in addition to those listed in the text document) that could influence the return on investment for AOs? How might these factors influence interest from the AO sector for initial and further competitions?

ASCL feels that other organisations may be better equipped to answer this specific point.

Q42 Which of the proposed performance measures are most important? Are there any other measures, such as student and employer feedback that should be part of the accountability system for T levels?

We agree that the main performance measures of completion/attainment, progress, destinations and maths/English are the right ones. They mirror those for academic qualifications and provide consistency to external stakeholders such as parents, prospective students and Ofsted.

We do understand that a VA progress measure is difficult to calculate in a T level context but would encourage continued dialogue and are happy to assist in this exploration.

In addition we view the progression measure as being very important and certainly should carry more weight than it does with academic programmes. Getting this right is again difficult but we are happy to assist in its development.

We also think that there should be some measure of employer feedback (though probably not initially as a headline measure). It needs to be simple but relevant perhaps akin to asking employers whether or not they would employ the student if they had a post available, based on their work placement performance.

Q43 Do you have any comments about how we might approach the funding of T levels? How could the funding formula be adapted to distribute funding for T levels?

We agree with the principle of initial in-year funding followed by lagged funding once the programmes are established.

We would also recommend that if T level funding is not spent in one particular year then it should not be handed back to the Treasury, but is kept within the 16-19 system and redistributed to providers of academic programmes to help finance more higher quality work experience for their students – which is still following the principles of preparing young people for working life, building resilience, knowledge of occupational areas etc.

Q44 How might we adapt funding flows to awarding organisation, to make sure that the full range of T levels is available to students around the country?

It would be extremely concerning if T levels had widely differing costs – which may lead to providers choosing the cheaper ones. This could be addressed by awarding appropriate cost weightings to the T levels as part of the funding formula, which would flow through to subsequent allocations to providers.

Q45 How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not?

ASCL is fully committed to ensuring equality of opportunity for all young people and adults. We have two key points to make in this section.

Firstly, appropriate impact studies should be made to consider the decision that students must successfully complete a work placement in order to pass a T level. If certain types of students e.g. of a particular faith, are congregated in a particular geographical area where minimal occupational employers are based, then it may be that those students are being discriminated against.

Secondly, the principle of performance measures being broken down by numbers of disadvantaged students (as the new 16-18 measures are) should also be adopted for T level accountability.

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