

Provider funding for the delivery of T levels

Joint response of the Association of School and College Leaders and Principals Professional Council

Introduction

1. The Association of School and College Leaders (ASCL) represents nearly 19,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. The Principals Professional Council (PPC) joined forces with ASCL in 2014 and now operates as a committee within ASCL. PPC represents principals and senior leaders in further education colleges. Many FE providers also offer post-18 and higher level provision, including professional training courses and higher education.
3. ASCL/PPC welcomes the Government's consultation on T Levels funding. We are pleased that the Government is consulting on such an important issue. We also acknowledge that the methodology proposed has been the subject of much consideration within the available funds for these new qualifications. However, not considering funding across all 16-19 study programmes is a missed opportunity, and may be perceived by some as an attempt to 'cajole' schools and colleges into directing students towards T levels in order to attract more funding for their institution.
4. In particular, ASCL/PPC urges the Government to consider the funding rates for these qualifications, and to consider the significant resource required in relation to EEP and industry placements, especially in rural areas where students will have to travel to the kind of employer with which they seek to gain experience.
5. We also firmly believe that, in order for students and their parents to value T levels, a programme of awareness-raising is needed about how the further education and skills sector will help them achieve their chosen career.

Answers to consultation questions

Question 1: Do you agree with the proposals for funding bands and hours set out in the consultation?

6. We believe that the funding rate per hour is an improvement, but still inadequate, as it is based on present study programmes averaged at 600 hours. The reality is that this should be based on much closer to 540 hours, which is where most institutions operate. However, not raising the rate for **all study programmes** at the same time as this change is a missed opportunity. There is no apparent rationale for having

differential rates for different types of study programmes, and this is likely to lead to inappropriate institutional behaviour when recruiting students.

7. Without having seen the content requirements for the Technical Qualifications, we are unconvinced about the need to place different T levels in different funding bands. In principle, we support a 16-19 system that pays similar amounts for similar levels of qualification. If a T level needs to be substantially larger, e.g. because of additional technical qualifications or longer work placements, then additional funding should be provided for this. However, the core planned hours should be the same as for present study programmes for all T levels. If T levels *are* going to be in bands, there will need to be constant checks against the emerging content for each T level, as set out by the Institute of Apprenticeships.
8. Within the context of the previous comments, we agree with splitting the funding over the two years.
9. We welcome the proposal to fund 18-year-olds at the same rate as 16- and 17-year-olds. However, this highlights the **stark inconsistency with present study programmes**, and makes the present system seem even more unfair. Again this could lead to inappropriate institutional behaviour.
10. We look forward to seeing updates on the transitional year as soon as possible, as this stage of learning is a vital progression step for T level students.
11. We do not believe sufficient funds are allocated to EEP, as 150 hours equates to approximately two hours per week. We would like to see a minimum of 180 hours, i.e. closer to three hours per week.
12. We call for urgent consultation on, and plans for, the funding of institutions such as special schools and special academies. We are disappointed that this is not included along with this main consultation.

Question 2: Do you agree with the proposed approach to allocating T levels to funding bands, subject to further checking against the emerging content for each T level?

13. Notwithstanding our comments in response to Question 1, we agree with calculating the rates pro rata using the current base rates. However, not allocating the 'small T levels' to the present band 5 rather appears to be doing something different for the sake of it. Using band 5 as the starting point would show more logic and consistency with existing study programmes (again notwithstanding our comments on bands per se).

Question 3: Do you agree with the proposed method for allocating funding for industry placements for students on T levels?

14. We welcome the way that the CDF has been used to trial and prepare institutions for the industry placements. This has been well thought through and appreciated by institutions. Going forward, we understand that the CDF will be replaced by the indicative funding rates of £550 per placement. In principle, we also agree with the move to lagged funding over time once steady state delivery is achieved.
15. However, we **do not** believe that the funding for industry placements is sufficient to cover the cost of finding and motivating students, dealing with matters as they arise, and liaising with employers. This is particularly true for providers, for whom the majority of their employers are SMEs and are located in rural areas.

16. We would also seek assurance that, until lagged funding is in place, institutions where students drop out without having started their placement (e.g. during the summer of Year 1) will not have this funding clawed back.

Question 4: Do you agree with the proposed criteria for the completion of an industry placement as part of a T level?

17. Notwithstanding our previous comments about the insufficient funding for the industry placements, we believe that the criteria set out in Annex A are broadly correct.
18. However, we believe that the minimum qualifying criteria should be 45 days **or** 315 hours – to allow for employers who may have unusual working patterns.
19. There should also be, as far as possible, a ‘joint’ decision between the employer and the provider over the successful completion of a placement. This would mitigate situations in which employers are acting unfairly towards the student, e.g. because of personal reasons. Where the provider and employer fail to agree then the IfA should be the final point of arbitration.

Question 5: Do you agree with the approach for funding level 2 maths and English for those students who have not yet met the minimum exit requirement?

20. Whilst we agree with this funding being additional to other T level funding, we do not agree with the underlying principle that it is funded differently from other 16-19 students on study programmes. This sends confusing messages, and again could influence institutional behaviour in recruitment. In practice, it could mean that students sitting in the same class resitting GCSE English and/or maths are receiving different levels of funding. This in turn means that they could be receiving different numbers of tuition hours and resources. This would be confusing and divisive for students and teaching staff, as well as being difficult to timetable, plan and monitor. All GCSE English and/or maths resit students should receive additional funding on top of their study programmes.
21. The upfront payment in Year 1 is also likely to lead to confusion over the condition of funding rule for those who do not pass in Year 1 (remembering that the vast majority of students do **not** pass their resit). The T level exit requirement rule only adds to the confusion here. This policy could lead to students being ejected from a course after their first year, even if they just narrowly failed one resit. This is not a message that the first cohort of students should be giving to other potential T level students thinking of enrolling.
22. Our experience also suggests that there will be some very able T level students who are not competent in either of these subjects at level 2 and we believe flexibility in funding should be considered in order to ensure equality of opportunity.
23. This might be an opportunity to consult on whether additional funding for maths/English for all 16-19 students is adopted as a model – perhaps re-examining its relationship with the £468 ‘nominal’ amount for disadvantage funding in the present funding formula.

Question 6: Do you agree with the proposals for ensuring that the extra funding for T levels programmes is made available in the year it is needed, before reverting to the usual lagged method of funding?

24. We believe that T level funding should be available in the year it is needed for the early deliverers. However, it is difficult to comment any further until the further guidance is published in summer 2019. We do, however, have an early query as to whether it is expected that T level student numbers will replace, or be in addition to, vocational student numbers. Is this information being gathered in advance?

Question 7: Do you agree with the above proposals for applying retention arrangements for T level programmes?

25. We agree with all of the proposals to apply retention for T level programmes. This will put T levels on a par with other vocational and study programmes, which is an underlying principle that ASCL advocates.

Question 8: Do you agree with the proposed approach for applying PCWs to T levels programmes?

26. We agree that PCWs should be applied to T levels in the same way as other 16-19 programmes. In addition, though, we feel it may be appropriate to consider uplifting some industry placement weightings where necessary additional costs may be occurred. For example, on construction-related pathways there may need to be specific clothing, such as a hard hat and boots, to be worn by students.

Question 9: Do you agree with the proposals for incorporating level 2 maths and/or English funding into the funding formula?

27. Notwithstanding our previous comments on the funding of level 2 maths/English, we feel that these proposals are logical and fair.

Question 10: Do you agree that disadvantage block 1 funding should be provided for T level students on the proposed basis?

28. Notwithstanding our comments in response to Question 5, we agree with applying the same funding rules as for existing study programmes.

Question 11: Do you agree that extra disadvantage block 2 funding should be provided for T level students on the proposed basis?

29. In line with our previous comments on the funding of level 2 English and maths, we do not agree that there should be an uplift to reflect the increased T level hours. The proxy funding of £480 per student is to support the student, e.g. by allocating some mentoring. This support is unlikely to increase with slight increases in programme hours. We would rather this funding be redirected to increase funding for maths/English teaching. As it stands, this is yet another example of a situation in which providers could be incentivised to move students from other programmes on to T level programmes to attract more funding.

Question 12: Do you agree that the Advanced Maths Premium and the Large Programme Uplift should apply for T level students on the proposed basis?

30. We agree with adopting the same rules for T level students as for existing 16-19 study programmes, for both the LPU and the premium.
31. However, we do not agree that EEP hours should be 'taken' from other students to facilitate the students taking an A level. This sends a negative message about the relevance and purpose of the EEP hours.

Question 13: Do you agree that the extra funding that will be provided for the new and larger T level programmes should be uplifted by area cost allowances as proposed?

32. We agree with adopting the same rules for T level students as for existing 16-19 study programmes for area cost allowances.

Question 14: Do you agree with the proposals for ensuring there is a way that provision can respond to the skills needs of particular local areas?

33. In principle, we agree that ESFA intervention to meet local skills needs gaps is the right approach. However, the decision-making mechanism, seemingly to be the Skills Advisory Panels, must include all local providers on its board. This would avoid instances in which additional funding might be allocated to 'other' new providers without the existing providers being given the opportunity to bid. The Government should bear in mind, however, that labour market intelligence and skills strategies are not necessarily equally robust and available in all areas of the country.

Question 15: 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?

34. See our response to Question 1: 'We call for urgent consultation on, and plans for, the funding of institutions such as special schools and special academies. We are disappointed that this is not included along with this main consultation.'

Concluding comments

35. In summary, we agree with many of the proposals outlined in this consultation. However, we do not believe that funding T levels using different principles from existing study programmes is the right approach.
36. The key points of difference are as follows:
 - allocating T levels to bands with fixed planned hours
 - additional funding for English/maths on top of core funding
 - increasing disadvantage block 2 funding proportionately
 - funding 19-year-olds at the full rate

37. These differences have the effect of highlighting the unfairness and inadequacy of existing study programme funding, and may lead to some providers being encouraged to enrol students for financial reasons rather than educational ones. The Government has an opportunity to ensure that funding principles are fair across all programmes of study for 16-19 year olds. Introducing different rules is a missed opportunity, and shows a lack of understanding of the sector's views and concerns and practices.
38. ASCL/PPC hopes that this response is helpful, and are willing to be further consulted on any aspects of this consultation.

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February 2019