



# Department for Education

Implementation of T level programmes

Association of Colleges response

8 February 2018

**Question 1: Do you agree that the principles outlined above are the right ones on which to base a review of which level 3 qualifications we should continue to fund in the new system, alongside T levels and A levels? Yes/No. If no, what other principles do you think we should consider?**

**No**

The principles are a good basis, but there also needs to be a thorough impact assessment. It also needs to take into consideration previous reforms.

The review needs to be robust and take into account student as well as employer and provider voice. It needs to consider the wider education context, progression into and from the 16 to 18 phase, and be mindful of previous vocational/technical innovations which have not gained traction. One of the reasons that technical/vocational education has failed to gain the recognition it deserves is because of constant change, e.g. GNVQs, AVCE, and 14-19 Diplomas. The review needs to learn from the experience of these qualifications and look to the future.

Consideration needs to be given to the number of students currently taking Level 3 Applied General Qualifications (AGQs), 142,530 16 to 18-year-old enrolments in the college sector, and effective transition arrangements for providers, teachers and students if any changes are to be made.

If changes are to be made, consideration needs to be given to the number of students currently taking Level 3 Applied General Qualifications (AGQs) - there are currently 142,530 enrolled in the college sector. Effective transition arrangements for providers, teachers and students will need to be put in place.

Social mobility will be impacted by any change to AGQs. In the 2017 cycle<sup>1</sup> 11% of higher education (HE) applicants applied with Pearson BTEC qualifications, the most common type of AGQ. A further 8% of applicants held a combination of A levels and BTEC qualifications; the fastest growing combination of qualifications for HE entry.

T levels should carry UCAS points to allow for entry to either employment or HE.

Consideration also needs to be given to those sectors not in scope of T levels, such as Sport, Travel and Tourism, Performing Arts, Music performance and some Art and Design qualifications. All of these sectors have employment opportunities available. The 'Employer skills survey 2015: UK' results' showed

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<sup>1</sup> <https://www.ucas.com/file/140421/download?token=OxqSmnRV>

that in 2015 employment in arts and other services was greater than in construction, agriculture and financial services. In other successful European systems such as Finland<sup>2</sup> and Sweden<sup>3</sup> there are pathways for sport, the arts, and travel and tourism.

Currently 42,600 16 to 18-year-olds<sup>4</sup> study vocational sport qualifications. There are a number of technical roles within this route such as pool plant operative. Consideration also needs to be given to the potential unintended impact on sport enrichment of any changes across the 16 to 18 phase. Sport initiatives aimed at enhancing leadership skills, self-confidence and mental well-being<sup>5</sup> may be adversely affected if there is less sport on offer in colleges.

We also strongly recommend a review of the work-based routes. Protective services, leading to occupations such as the police and armed services, and social care are both work-based routes. 23,000 16 to 18-year-old students<sup>6</sup> currently study Public Services, 69% of which are males. 46,000 students<sup>7</sup> study health and social care qualifications. It is unlikely that it would be appropriate for 16-year-olds to be able to access work based routes in either protective services or social care and yet many young people are keen to progress into such employment at 18. On the current courses students gain transferable skills such as teamwork, confidence, leadership and communication skills, which are all vital to the work place and customer/client focused environments in particular. There appears, therefore, to be a mismatch between route and the age and needs of the students involved.

**Question 2: 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? Yes/No. If no, what other principles do you think we should consider?**

**Yes.**

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<sup>2</sup> <http://ncee.org/what-we-do/center-on-international-education-benchmarking/top-performing-countries/finland-overview/finland-school-to-work-transition>

<sup>3</sup> <http://www.cedefop.europa.eu/en/publications-and-resources/publications/5198>

<sup>4</sup> IIR/Mides data

<sup>5</sup> <https://www.sportengland.org/funding/tackling-inactivity-in-colleges/>

<sup>6</sup> ILR/Mides data

<sup>7</sup> ILR/Mides data

Level 2 and below qualifications should support progression, but also need to be engaging and motivating for students.

On average, 46%<sup>8</sup> of students in General Further Education colleges currently study on programmes at level 2 and below and 23% at level 2. 48%<sup>9</sup> of students on current Level 3 programmes have progressed from Level 2 and may have progressed through the levels from entry or Level 1.

Some occupations such as building, crafts, hair, catering and motor vehicle have entry points to employment at Level 2 as indicated in the Institute for Apprenticeships draft occupational maps<sup>10</sup>. The current technical certificate model offers a range of qualifications at an appropriate level.

It should also be remembered that students working at Level 2 and below will vary considerably in attainment and starting points, from a D/3 GCSE grade average with some attainment at grade 4/C or above to no formal qualifications achieved at 16. This cohort will vary too in terms of needs and ambitions. Often students who have not been successful in a highly academic pre-16 context will flourish, progress and succeed on a technical course. Others will need additional learning and pastoral support to achieve to their potential. For some achievement may be independent living.

There needs to be clarity regarding what the offer will be in the pre T level/ level 3 space. Any review of qualifications needs to ensure that there are clear and well-understood progression pathways from lower levels to T levels and beyond. It is vital that school staff (both teaching and careers staff) are aware of these pathways and how best to advise students on their progression. Programmes at this level need to be appropriately funded in order to support those students furthest away from employment or progression to succeed.

**Question 3: Do you agree with the proposed approach to assessing technical qualifications? Yes/No – Please give reasons for your response.**

**No**

Technical education focuses on 'doing' and is more akin to apprenticeships than academic education. T levels should not look like A levels – they serve a different

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<sup>8</sup> ILR/Mides data

<sup>9</sup> ILR/Mides data

<sup>10</sup> [https://consult.education.gov.uk/apprenticeships/institute-for-apprenticeships-occupational-maps/supporting\\_documents/Draft%20occupation%20maps.pdf](https://consult.education.gov.uk/apprenticeships/institute-for-apprenticeships-occupational-maps/supporting_documents/Draft%20occupation%20maps.pdf)

purpose; preparing students for specific occupations whilst allowing for the development of transferable work skills. This needs to be reflected in the assessment and grading. Practical assignments and employer-set projects are the most realistic way to assess technical qualifications. Employers will require guidance, training and support in order to set appropriate projects.

Careful consideration must be given to requiring external assessment. Many students choose a technical route because they have not enjoyed or achieved their potential in an exam based system pre-16. It should be made clear to successful awarding organisations/consortiums that external assessment does not have to take the form of a written exam. In the world of work employees are rarely required to sit an external exam; they are required to complete project briefs, presentations, reports and other formal papers which lend themselves to an external assessment model or external verification.

Students with learning difficulties such as autism can find external assessment extremely stressful leading to poor performance which does not reflect their ability.

We must learn from previous reforms such as 14-19 Diplomas, which were very theoretical and therefore not attractive to students, and the Advanced Vocational Certificate of Education (AVCE). A review of the AVCE states that '[The] emphasis.... on knowledge and theory rather than on practical learning and achievement has reduced its scope' (Hodgson and Spours, 2003)<sup>11</sup>.

We can also learn and adapt practice from other countries, how do they assess understanding and competence?

**Question 4: Do you agree with the approach to grading technical qualification components? Yes/No – Please give reasons for your response.**

**No.**

In theory a system which combines an A level type grading system for core with an AGQ type system for the technical specialism sounds appropriate, although it is not in line with apprenticeships and the intention of the Sainsbury review<sup>12</sup>; two technical pathways (one college based one work-based), one outcome. Neither is it in line with the idea of simplicity for end user (employer or student).

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<sup>11</sup> Hodgson, A & Spours, K (2003) Beyond A levels: Curriculum 2000 and the reform of 14-19 qualifications. London and Sterling.

<sup>12</sup> <https://www.gov.uk/government/publications/post-16-skills-plan-and-independent-report-on-technical-education>

How will a student refer to his/her grades in practice; 'B-Distinction', 'A\*-pass'; which is the more competent at the role? Technical qualifications should allow for knowledge to be demonstrated through application.

The current Tech Levels are not subject to value added (VA) measures because academic baselines are not a good predictor for performance in a technical discipline. Why therefore should 'academic' grades be attached to technical qualifications in this reform?

If a dual grading system is adopted it will be vital to ensure that there is clear guidance available to all key stakeholders; students, parents/carers and employers.

**Question 5: Do you agree with the approach to maintaining comparable standards of performance for technical qualifications? Yes/No – Please give reasons for your response.**

**Yes**

It is vital that there is consistency across grading within and between providers. However, will employers have sufficient capacity to support standardisation processes?

**Question 6: Do you agree that prior attainment of the core could count if students switch to another T level within the same route? Yes/No – Please give reasons for your response.**

**Yes**

It is difficult to comment without knowing what will make up the common core in any given route pathway.

It would be helpful to have a clear percentage of the threshold for marginal differences. For example, would 80% or above have to be common? DfE should create a clear and easy to follow credit transfer programme. The benefits of such a system in higher education are discussed in Professor Sir David Watson's paper 'Credit Risk? Reviving credit accumulation and transfer in UK higher education'<sup>13</sup>

**Question 7: Do you agree with the proposed approach integrating the work placement within the T level programme? Yes/No. please explain your answer. If no, what would be a preferable approach?**

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<sup>13</sup> <https://www.lfhe.ac.uk/en/components/publication.cfm/ST-17>

## No

Work placements are undoubtedly an excellent opportunity for students to experience the real world of work as part of their course, but consideration needs to be given to ensuring that there are sufficient high quality placements available, especially in rural areas, places with little or no skilled industry, or areas with large numbers of providers competing for suitable placements. This could have the unintended consequence of becoming a key determining factor in a provider's choice of T levels to deliver.

There should be an option for students to achieve a T level without the required work placement if, despite every effort, a suitable high-quality work placement cannot be found or the work placement breaks down for reasons beyond the control of the student and college.

Many students have paid, part-time jobs. Some students may need such work to support theirs or their family's income. Consideration needs to be given to how this part-time employment can contribute to the work placement requirement or at least not prevent students from continuing in part-time employment.

Consideration must be given to an overarching, nationwide campaign to encourage employers to offer work placements and approaches for providers to work together to secure placements from employers.

In Finland, as part of the changes to technical and vocational education<sup>14</sup>, college placement exchanges whereby a student can do an external work placement in another college are part of the system.

**Question 8: Do you agree with the proposed method of appraising the student's performance on their work placement, including the Employer Reference?  
Yes/No. please explain your answer. If no, what would be a preferable approach?**

## Yes

It is vital that students, employers and colleges are clear about the expectations of individual students on work placement. This should take the form of a clearly defined work placement agreement between all three parties and for students under the age of 18 require a parent/carer signature. A nationally agreed, automated system would help support colleges and employers put this in place.

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<sup>14</sup> [http://minedu.fi/en/article/-/asset\\_publisher/ammattillisen-koulutuksen-reformi-hyvaksyttiin-suurin-koulutusuudistus-vuosikymmeniin](http://minedu.fi/en/article/-/asset_publisher/ammattillisen-koulutuksen-reformi-hyvaksyttiin-suurin-koulutusuudistus-vuosikymmeniin)

There needs to be clarity as to whether tasks and projects undertaken during the work placement count towards the graded assessment of the specialist component.

**Question 9: Do you agree with the proposed approach to quality assurance set out above? Yes/No – please explain. If no, please explain how we can ensure work placements are quality assured?**

**Yes**

The outlined approach appears to cover most bases of health and safety/safeguarding, 'service level agreement' and effective review and monitoring. It needs to be explicit whether or not employers will require DBS checks to host extended work placement.

There needs to be clarity over the terms 'drug and crime history'. Does this refer to placements where students may be working with vulnerable others, e.g. childcare? Colleges may not always know if a student uses non-prescription/recreational drugs. Is alcohol classified as a drug in this instance? If a crime is not serious and/ or is 'spent' this shouldn't necessarily prevent a student taking up a placement.

There need to be clear guidelines regarding how placements will be inspected.

**Question 10: 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?**

It is critical that students with special educational needs or those with caring responsibilities or limited travel options have access to work placements which take into account their specific needs. This should be discussed at the earliest opportunity and agreed as part of the work placement agreement. In exceptional circumstances (for example caring for a seriously ill relative) a work placement may need to be waived. As with the 5% tolerance for English and mathematics it should be recognised that 100% compliance with the work placement requirement will not be possible. This should not limit the individual student's opportunity to achieve a T level if every effort has been made to secure an appropriate placement or the placement has broken down.

Reasonable adjustments need to be put into place. However, there should a threshold of the amount of work placement funding a provider should be expected to contribute. For example providing 1:1 communication support for a hearing impaired/ deaf student for 450 hours (12 weeks x 37.5 hours) could cost over £7,000.

**Question 11: 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?**

Where work placements are not readily available in the students' area consideration should be given to students completing employer briefs within the college environment. In Creative Industries for example this may well be more realistic than working at an employer as many employers are micro-sized. There may also be social action/community projects that could be completed within construction trades for example. Charities, schools, local authorities and the NHS (all of which can be found in all areas) could provide project briefs and oversee projects. They could also provide a variety of placement opportunities which are not their core business, e.g. digital placements may be available in all these settings.

College staff would need to oversee the work where this is not the employer's key business, e.g. students could carry out small building/ repair/ landscaping/ digital projects for local schools or other colleges. Some such projects would need to be overseen by college staff. However, there are some occupational areas where this may be more challenging, e.g. engineering and manufacturing.

**Question 12: Do you agree with our suggested approach to providing students with financial support whilst on a work placement?**

**No**

There needs to be consistency of approach towards financial support for students across all work placements. A differentiated approach will lead to the possibility of students and colleges favouring one placement over another and an unfair system for students. Some employers may be able to 'pay' students, others, especially SMEs, may not be able to do so. Current work placements in early years for example are not paid as they are seen as being an integral part of the course.

However, some students, especially those in more remote areas or those from more deprived backgrounds may be put off from embarking upon a T level programme if they have to pay for additional travel or other expenses such as meeting a dress code. Therefore there should be funding available to colleges to ensure that travel and other expenses associated with work placements can be met for those students who are unable to meet this additional course related expense. A central fund which employers who can and wish to pay into could be

established for this purpose. Possibly unused apprenticeship levy funding could be utilised.

College leaders who responded to an AoC survey on this question were divided 50/50 in their opinion. Some expressed a concern about the perception of students working for nothing, while others felt that work experience would form an integral part of the course and should not be paid.

This key issue needs to be explored further to provide a consistent approach which meets student, college and employer needs.

**Question 13: What are the common barriers / challenges for employers to host work placements and how can we support employers to offer work placements?**

Employers may face the following barriers/ challenges:

- Too many calls on their time; traineeships, apprenticeships, work experience and placements – it may be difficult to know which to prioritise.
- Approaches from many providers in one area, especially for large corporates and niche employers.
- Limited understanding of the aims of T levels and the benefits of accommodating a work placement student.
- Lack of capacity - staffing and time; this is especially true for small businesses with few staff.
- Fears over the responsibility of monitoring placement perceived lack of guidance.
- Health and safety legislation in specific occupations may mean that it is too high a risk to take a student on a placement.
- Employers need to have appropriate liability arrangements in place.

Employers can be supported to offer work placements in the following ways:

- A city/ local authority/ LEP based co-ordinated approach to establishing work placements.
- Incentives such as using part of their levy payment
- Promoting the benefits of work placements – reducing recruitment expenses by recruiting from work placement students
- Ensuring employers feel guided and supported throughout the process

- Colleges and other providers working together to engage with employers within a city/county/region to ensure a single point of contact

**Question 14: How do these challenges vary across industries and location types?**

Lack of capacity is a bigger issue for SMEs than for large corporates who often have training and school/college engagement departments.

Research carried out in Finland where six month 'on-the-job' learning has been part of 'classroom' based programmes since the early 2000s indicates that it is much easier to access and for placements to be successful in the caring professions, such as health and social care than in technology<sup>15</sup> due to a long history of placements in caring professions.

Rural employers may be willing to offer placements, but students may have difficulty accessing them if they have to rely on limited public transport options.

**Question 15: How can the range of employers, including SMEs, be better supported to offer work placements for students with additional needs?**

Communication, support and guidance are crucial to ensure that work placements for all students are successful, but especially so for students with special educational needs. It is important that employers are fully informed of a student's additional needs and that the college is confident that they and the employer can meet the student's needs within the work place. The employer, college, student and parent/carer (where appropriate) should all be aware of who is responsible for what and where to seek help if there are any issues.

Reasonable adjustments, such as flexible hours for young people with caring responsibilities, should be put in place. In some cases a work placements may need to be waived.

**Question 16: Would employers value recognition in delivering work placements, for example through a form of 'kitemarking'?**

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<sup>15</sup> Lasonen, J. (2000). Enterprises and schools as work-based learning environments in Finland. In M.-L. Stenström, & L. Lasonen (Eds.), *Strategies for reforming initial vocational education and training in Europe* (pp. 177-202). Jyväskylä, Finland: University of Jyväskylä, Institute for Educational Research.

Stenström, M., & Virolainen, M. (2014). The history of Finnish Vocational Education and training. Nord-VET

Derby College has a successful branded academy programme for employers which provides wider benefits to employers<sup>16</sup> such as training and promotion as well as helping to support business recruitment.

Smaller employers may benefit more from tax breaks or other financial incentives.

Any kitemarking should be nationally branded to meet the needs of large companies based throughout England with the opportunity for a local flavour to take into account the local context and the needs of smaller businesses.

How would such a kitemark be funded? Could this money be better spent elsewhere?

**Question 17: Should students be able to opt to take higher level mathematics or English qualifications e.g. core mathematics, A level mathematics, 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 should not be a cap on student aspirations. Some T levels may be designed to incorporate higher level English or mathematics. It should be noted that at the moment there is no English equivalent to core mathematics at L3. Some students who have already achieved 4-9 grades in their English and mathematics GCSEs may be motivated to T levels by the opportunity to study English or mathematics at a higher level alongside a T level.

However, the provision of higher level English and mathematics needs to be seen as part of the bigger English and mathematics picture. Year-on-year 40% of young people do not achieve English and mathematics GCSEs at 4/C or above at 16. 200,000<sup>17</sup> students retake GCSEs in colleges every year under the current condition of funding (CoF). Colleges are already struggling to deliver CoF requirements, especially in mathematics due to a limited pool of staff. Moreover, the CBI/Pearson education and skills survey 2017<sup>18</sup> states that employers need staff with 'solid basic skills', effective communication skills and the ability to cope with numerical data, that is, not the depth of language analysis or mathematical formulae required by English and mathematics GCSEs.

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<sup>16</sup> <https://www.derby-college.ac.uk/employers/employer-academies>

<sup>17</sup> ILR/mides data

<sup>18</sup> [http://www.cbi.org.uk/index.cfm/\\_api/render/file/?method=inline&fileID=DB1A9FE5-5459-4AA2-8B44798DD5B15E77](http://www.cbi.org.uk/index.cfm/_api/render/file/?method=inline&fileID=DB1A9FE5-5459-4AA2-8B44798DD5B15E77)

The introduction of a new technical education system is an ideal opportunity to review the current CoF and available qualifications in the round in order to meet employer and student needs at both 16 to 18 and for adults.

An English and mathematics advisory panel should be set up to advise each of the route panels on English and mathematics requirements, appropriate resources to encourage embedding and mapping to naturally occurring English and mathematics opportunities.

**Question 18: Which of these options for funding mathematics and English within the T level programme do you think would be the most appropriate? Please explain the reasons for your answer.**

Funding for pre-Level 3 English and mathematics should follow option 2, that is, it should be funded for those who need it on top of the T level. This would be the best use of funding both for those who still require L2 English and mathematics and those who already have it. However, consideration needs to be given to the total number of hours a student without English and mathematics is required to study to meet this requirement, especially for those students with caring responsibilities or those who need to work.

Consideration needs to be given to how best to deliver English and mathematics alongside work placements during specialisation. A model of four days-a-week placement and one day-a-week English and mathematics for example will require students to be highly motivated to attend and colleges to spend a great deal of time tracking attendance.

Colleges currently deliver GCSEs over 30 weeks per year and in one year (though many students need to retake more than once to achieve the required grade). Colleges deliver between 2 or 3 hours a week- that is between 60 and 90 hours a year. One level of functional skill is delivered within 45 hours. The funding needs to allow a model of at least 90 hours per year for GCSE and 45 for functional skills. Allowing students to take functional skills where appropriate and in line with their intended destination is a more cost effective model and would allow colleges staffing flexibility to deliver higher level English and mathematics if required.

**Question 19: 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? If not, why not?**

**Yes**

Any licence to practise that enables a student to be more employable should be delivered if it is viable within the funding envelope available to colleges. Some occupation-specific requirements, such as AM2, will require additional funding as they are very expensive to deliver.

**Question 20: Do you agree with the information we propose to include in the certificate? Yes/No – Please explain your answer.**

**Yes**

Though there should be an overall grade for the T level (see response to question 4).

**Question 21: Do you agree that partial attainment should be reflected in the proposed transcript? Yes/No. Please give reasons for your response.**

**Yes**, it is vital that partial attainment is recognised, especially if the minimum level of English or mathematics is **achievement** of level 2. Currently 75%<sup>19</sup> of students fail resits of English and mathematics GCSE each year and are less likely to achieve GCSEs the more times they take it<sup>20</sup>. Achievement rates of level 2 Functional Skills in mathematics is also low at less than 30% possibly because those students taking it are working at a lower level; the progress measures require students with grade 2 mathematics to achieve Level 2<sup>21</sup>.

Some students may not be able to access or complete a work placement due to no fault of their own or that of their provider. If a placement is withdrawn by the employer or breaks down for reasons beyond the control of the student or college this should not reflect negatively on the student.

**Question 22: How can T levels be designed in a way that enables students to progress onto apprenticeships?**

It is important that all T levels have line of sight to progression and ultimately employment. Progression and destination should be highlighted to students and parents/carers (where appropriate) from the student's first contact with their prospective T level provider. This will help to ensure that the student is on the appropriate route for their aspirations and needs and help to provide meaningful targets.

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<sup>19</sup> ILR/Mides data

<sup>20</sup> ILR/Mides data

<sup>21</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/642348/16-18\\_Accountability\\_Measures\\_Technical\\_Guide2.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/642348/16-18_Accountability_Measures_Technical_Guide2.pdf)

This will only be possible if there is clear mapping of routes from T levels through advanced and higher apprenticeships to degrees and degree level apprenticeships. T levels should also be aligned with apprenticeship frameworks/standards to support seamless progression from one to the other.

Work placements may also provide an opportunity for student and employer to discuss potential apprenticeship opportunities on course completion. Such consideration should form a part of the initial discussions with the employer.

**Question 23: How can T levels be built to provide a solid grounding for, and access to higher levels of technical education?**

There should be clear mapping of routes from T levels through advanced and higher apprenticeships to degrees and degree level apprenticeships. Extended projects or HE bridging units would allow students to experience what a higher learning experience will require.

T levels need to have UCAS points to allow entry to higher education.

It needs to be noted that apprenticeships exist at different levels and that the progress is not akin to the three-year, level by level approach from levels 4 to 6 as in a traditional degree.

**Question 24: What good practice already exists in enabling learners with technical (rather than academic) backgrounds gain access to, and succeed on, degree courses?**

Higher education providers offer academic support sessions to help students who come from non-academic backgrounds as well as those who do. Some higher education providers, such as the University of West London, offer summer academic study skills bridging courses. Weston College's LEAP programme helps prepare students who wish to progress to degree level study. In addition HE programme co-ordinators set level 4 bridging projects for level 3 students. HE mentors act as mentors for these projects.

Consideration also needs to be given to financial and pastoral support for students for whom living away from home and with limited financial support is new and daunting. Higher education providers should be asked to account for their retention in the way that further education colleges are asked to do.

**Question 25: 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?**

There needs to be clarity as to whether the transition offer is only for those students aiming to progress to T levels or for all post 16 students at level 2 and below. The Sainsbury review referenced a transition offer in the academic route. Is this still being considered as a separate option or will students be able to progress to an academic option from the technical transition route?

Too many pre level 3 options will be confusing for key stakeholders such as schools, parents/carers and young people.

It also needs to be borne in mind that unlike education systems such as Finland where 'school leaving' achievement is level across the cohort<sup>22</sup>, this is not reflected in achievement at 16 in England. The cohort will have varied starting points and profiles.

Currently 46% of 16 to 18-year-old students at general further education colleges are on study programmes at level 2 and below<sup>23</sup>. This cohort varies considerably in attainment and starting points at 16, from a D/3 GCSE grade average with some attainment at grade 4/C or above to those holding no formal qualifications. This cohort varies too in terms of needs and ambitions. Often students who have not been successful in a highly academic pre-16 context will flourish, progress and succeed on a technical course. Others will need additional learning and pastoral support to achieve to their potential.

The diverse needs of this cohort and industry requirements need to be considered when planning the pre T level offer. To provide a one-size-fits-all option for all students working at below level 3 will result in failing to meet the needs of the majority. The offer needs to be differentiated but at the same time easy to explain to key stakeholders.

Many colleges already offer a pre level 3 access programme (e.g. Nelson and Colne and Barnsley) or level 1 and below access to level 2 programme (e.g. West Suffolk). It would be helpful to consider existing practice and what works.

#### Level 2

Some occupations as they are currently organised require level 2 qualifications. These include construction trades, motor vehicle, hairdressing and catering.

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<sup>22</sup> [http://ec.europa.eu/dgs/education\\_culture/repository/education/tools/docs/2015/monitor2015-finland\\_en.pdf](http://ec.europa.eu/dgs/education_culture/repository/education/tools/docs/2015/monitor2015-finland_en.pdf)

<sup>23</sup> ILR/Mides data

There are job roles (for example office administration or customer service) where automation may substantially change occupational requirements and the numbers of young recruits needed in the 2020s, but no one should assume that all jobs will be reset to a higher level. Technical certificates at level 2 already exist and could be augmented with a work placement supported by an appropriate level of funding. There should also be additional funding available to enable these students to improve upon their literacy and numeracy and gain the employability skills such as positive attitudes and resilience<sup>24</sup> as cited by the 2017 CBI/Pearson Education and Skills Survey. The latter can be achieved through work placement or youth social action participation through community orientated projects. They should also include opportunities to build the skills required for T levels, such as external assessment.

#### Level 1 and below

23% of students at general further education colleges are on programmes at level 1 or below. These students will be furthest from the work place and more vulnerable to becoming NEET. The funding available to this cohort must reflect their needs and should be in line with T level funding if the government is really committed to progress and social mobility.

Young people are currently signposted to lower level programmes due to poor previous attainment and or because they need to spend longer on developing hand skills. This pre level 2 cohort is far from homogenous including: SEN students with Education Health and Care Plans (EHCPs); those with learning difficulties; home educated young people holding no formal qualifications; ESOL students whose main barrier is poor command of English; those who have attended alternative provision such as Pupil Referral Units (PRUs); school non-attenders; those with emotional behavioural difficulties and or mental health and anxiety issues; those with challenging home circumstances; lack of motivation; illness; students who have achieved GCSEs including mathematics and English at grade 2/E or below, but also some who have a more spikey profile including grade C and D GCSEs, but are not able to embark straight onto a level 2 course perhaps because of low self-esteem/ confidence.

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<sup>24</sup> [http://cbi.binarydev.net/index.cfm/\\_api/render/file/?method=inline&fileID=DB1A9FE5-5459-4AA2-8B44798DD5B15E77](http://cbi.binarydev.net/index.cfm/_api/render/file/?method=inline&fileID=DB1A9FE5-5459-4AA2-8B44798DD5B15E77)

Factors crucial to the success of this cohort are captured in the DfE commissioned reports 'Effective practice in supporting Entry/level 1 students in post-16 institutions'<sup>25</sup> and 'Effective curriculum practice at below level 2 (BL2)'<sup>26</sup>

Transition to a new educational environment is a challenge for all young people, but is even more so for young people with poor educational attainment<sup>27</sup>.

Therefore it is essential that colleges have full access to information of all young people progressing from school at 16, but even more so for low attainers at GCSE. Anecdotal evidence from colleges would indicate that currently transition information is not consistent and focuses on students with EHCPs.

Each student should undergo a thorough initial assessment to gauge vocational aptitude, ability in English and mathematics and potential barriers to achievement. It is possible at this stage that some students, such as those who have been home educated or progressed from PRUs may be better suited to go straight onto a T level. Initial assessment should include an element of 1:1 with a member of staff and taster opportunity/ skills and aptitude test. Each student should have a clear plan to help them to achieve their ambitions. If the student does not have a clear pathway or route time should be taken to signpost options.

The first days and weeks at college are critical to success. All colleges offer induction processes with opportunities for team building, site orientation, introductions to key staff, outlines of expectations. These help to create a safe and welcoming environment for students.

The post-16 level 1 and below offer has to have a hook – the subject that the young person wishes to study and or line of sight to work, which is key to the ambitions of many young people working at this level, are crucial for engagement.

Consideration also needs to be given to additional components of the programmes such as the basic skills of English and mathematics which are key to successful life outcomes, but not necessarily central to a young person's motivation. Staff who empathise with the individual's starting point in these subjects and effective embedding into the technical and professional curriculum

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<sup>25</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/566749/DFE-RR614-Supporting\\_entry\\_and\\_level\\_1\\_students\\_in\\_post-16\\_institutions.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/566749/DFE-RR614-Supporting_entry_and_level_1_students_in_post-16_institutions.pdf)

<sup>26</sup> <https://www.gov.uk/government/publications/post-16-effective-curriculum-practice-below-level-2>

<sup>27</sup> [Niesr.ac.uk/sites/default/files/publications/dp445.pdf](https://www.niesr.ac.uk/sites/default/files/publications/dp445.pdf)

are key. GCSEs may not be the most effective qualifications at encouraging students to engage with these subjects. Alternative options including stepping stone qualifications should be explored.

Work experience is key here too. Some students working at level 1 or below will not be ready for work experience; they will lack basic work communication skills and confidence and may not take nor follow instructions. The Traineeship type model with work experience at its core will not meet the needs of these students. Others will embrace this opportunity as they are keen to be employed. Meeting students' individual needs at this level takes time and adequate resourcing. Some students may have part-time jobs which support the development of team building and communication skills. Where appropriate these roles should be incorporated into students' individual learning plans.

Students may also benefit from Youth Social Action and well-being projects to broaden their experience, build grit or resilience and decrease anxiety<sup>28</sup>, but the projects will need to be well-thought through in order to encourage this profile of student to engage.

As the majority of young people working at level 1 or below will have some sort of support need for learning and or behaviour there needs to be sufficient in class and out of class support to meet these needs.

Not all young people on lower level programmes have a supportive home network to help them navigate the paths to adulthood and employment. A key adult (tutor, key worker or appropriately trained mentor) will help in this respect; make contact if attendance or behaviour fall below expected thresholds and provide a sounding board for concerns or aspirations.

It is currently proposed that transition year students will not receive the additional funding being allocated to T levels. This decision should be reviewed. Level 1 and below students in particular are furthest from progression, employment and positive life outcomes. The support, teaching and learning they need to succeed is resource intensive and thus expensive. Under current funding, students working at this level need much longer than a year to gain confidence in their skills and achieve in English and mathematics at level 2. Funding should allow for adequate time for English and mathematics.

## **Question 26: How should we adapt T levels for adults so that they**

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<sup>28</sup> <http://38r8om2xjhl25mw24492dir.wpengine.netdna-cdn.com/wp-content/uploads/2016/01/YSA-Report-Final-Version1.pdf>

## meet the needs of adult learners?

T levels should be able to meet the needs of both the 16 to 18 cohort and 19+ students. The key issue is funding, both for the course and to support the adult learner returning to education. Adults are unlikely to embark upon a two-year full time programme of more than 24 hours a week unless it makes financial sense for them to do so. 19+ T levels need to be appropriately funded for adults. A single funding mechanism for both 16 to 18 and 19+ as recently established in Finland<sup>29</sup> could be an option.

**Question 27: What do you think the biggest challenges will be for providers in delivering new T levels and what additional support do you think providers will need? Specifically, ensuring:**

- the right facilities are available
- the right equipment is available
- appropriately trained staff are recruited, and in the numbers required
- existing staff get high quality training and development

Inadequate 16 to 18 funding continues to be a significant issue for the post 16 sector. The additional funding for T levels will only allow for more hours at the existing rates, not increase the amount of funding overall. 16 to 18 funding levels are 21% lower than for 11 to 16 provision<sup>30</sup>. This needs to be addressed if England wishes to be a world leader in further education.

Colleges offer a wide range of education and training opportunities within their local communities. They currently face what could be viewed as an unprecedented amount of change: area-based reviews and mergers; devolution and changes to adult education funding mechanisms; T levels; linear A levels; English and mathematics condition of funding; varied local authority practice for funding high needs students; the impact of the apprenticeship levy and the move to standards; the new HE regulatory body, the Office for Students. Colleges are resilient and have expert leadership, but they will need capacity, time and possibly support at a senior level to plan for T levels within this larger landscape.

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<sup>29</sup> <http://minedu.fi/en/vocational-education-and-training>

<sup>30</sup>

[https://www.sixthformcolleges.org/sites/default/files/031117%20SOS%20Funding%20Impact%20Survey%202017%20FINAL\\_0\\_0.pdf](https://www.sixthformcolleges.org/sites/default/files/031117%20SOS%20Funding%20Impact%20Survey%202017%20FINAL_0_0.pdf)

Based on the information currently available regarding T levels, work placements will be the largest challenge to deliver in terms of college and employer capacity, student travel and quality assurance. It may also be a challenge to recruit staff in areas identified as having skills gaps at levels 4 and 5. Put simply, engineers, for example, can earn more on site than in the classroom. Programmes such as the ETF/Gatsby Further Forces<sup>31</sup> which supports ex service personnel into teaching positions within colleges should be evaluated and if successful, extended into other sectors.

Colleges already have state of the art, industry standard facilities, but may require additional equipment, facilities and staff training and industry up-dating placements to meet the requirements of specific occupational clusters. Increased investment in facilities and hours combined could help the shift to technical programmes witnessed in countries such as Austria where 75% of students take a technical route after their compulsory education<sup>32</sup>.

One option for DfE will be to design new programmes to address these issues and to carve out specific funds to support them. An alternative approach to addressing staff and capital equipment needs will be to raise overall funding rates and extending formula based capital funding to colleges.

**Question 28: 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?**

It is generally accepted that young people must be able to make informed choices early enough in their formal education regarding their future careers so that they do not close down their options. This means that there needs to be a clear line of sight from key stage 4, through the transition offer and level 2 where appropriate to T levels and their subsequent learning and employment destinations. A 14-year-old should be able to view the alternative routes to a particular aspirational career outcome and then have an opportunity to consider the 'fit' each route presents to them. This is particularly the case when there are credible academic and vocational routes available.

Technical Education cannot be seen in isolation from the rest of the education system, especially the progression from school and onto levels 4 and 5. Students currently in year 9 will be the first students able to access a T level programme in

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<sup>31</sup> <http://www.gatsby.org.uk/education/latest/further-forces-programme-launched>

<sup>32</sup> <http://www.cedefop.europa.eu/en/publications-and-resources/publications/8113>

2020. Those in schools with 3-year KS4 programmes have already made their option decisions. Those on two-year KS 4 will make their decisions later this academic year. These decisions should be informed by comprehensive and impartial careers education, information, advice and guidance (CEIAG) so that young people are aware of all the opportunities available.

Students and parents/carers are key stakeholders, but school teachers (both subject teachers and careers staff) and employers need to be fully informed too in order ensure that they recognise the value of T levels and are able to promote them effectively.

Colleges prepare their curriculum offer up to 18 months in advance of delivery and prospectuses up to a year in advance of delivery. Therefore key information about T levels to be delivered in 2020 needs to be available by June 2018 at the very latest. It needs to be clear what the programme will look like including core and specialist units and how it will be assessed and graded.

**Question 29: How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching, and training other members of staff?**

On average colleges have contact with over 600 employers through their apprenticeship, work placement and employer training offers. College staff are encouraged to undertake sector update training. Some college staff work in their chosen industry alongside their teaching commitments. Ofsted reports comment on the good and outstanding relationships that colleges have with local employers<sup>33</sup>.

**Question 30: What challenges will providers face if they want to bring in more industry expertise?**

Colleges have good relationships with many local employers, but many of these will be SMEs with limited capacity to provide resource to support delivery. If colleges wish to employ industry experts they need to be able to recruit in a competitive market where industry is able to pay more.

The number of different requests made to employers could back-fire and result in employers withdrawing from some or all their work with education providers.

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<sup>33</sup> <https://reports.ofsted.gov.uk/>

**Question 31: Should we seek to further influence which T levels are offered by providers, according to local and national skills needs?**

**Yes/No. If yes, how should we do this?**

**No**

Limiting the T levels offered by local and national needs would limit opportunities to young people. Young people opting to take T levels should have the same opportunities to work locally, regionally, nationally or internationally as their counterparts in the 'academic' route. No one is suggesting limiting the choices of A level students to local or national needs. In terms of equality of opportunity this should be the same for students on T levels.

**Question 32: 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?**

Colleges are independent, government funded providers. They currently make their own decisions on which courses to deliver based on local demand. Colleges currently utilise LMI data and work with their local LEPS, chambers of commerce and others to support and inform their planning assumptions. They also respond to local employer requests for training in areas specific to their locality. The joint AoC/UKCES guidance document, 'Using labour market intelligence in a college context'<sup>34</sup> gives an indication of the type of work colleges are currently doing to ensure they plan for local, regional and national needs.

**Question 33: What additional support will providers need to ensure that T levels meet local skills priorities?**

Colleges already have good relationships with their local LEPS, chambers of commerce and employers. Colleges need to be key partners in Skills Advisory Panels (SAPs) within their local areas. This should be facilitated through LEPS, or the equivalent local body.

**Question 34: What material could reasonably be included under the copyright of a technical qualification? Are there any other steps that we could take, within the**

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[https://www.aoc.co.uk/sites/default/files/Using%20Labour%20Market%20Intelligence%20in%20a%20college%20context\\_5.pdf](https://www.aoc.co.uk/sites/default/files/Using%20Labour%20Market%20Intelligence%20in%20a%20college%20context_5.pdf)

**parameters of the legislation, that would allow this to operate effectively and in everyone's interests?**

- Crown copyright should protect the design, structure, specification, standards and learning objectives.
- Content should remain the intellectual property of the creator of the content.
- Awarding organisations can create content and other related materials (and charge for these – as can others in an open market)

**Question 35: 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?**

A licence of 5 or more years would seem unnecessarily long, unless there are clear safeguards to mitigate awarding organisation failure.

Lotting seems a very good idea to protect niche occupational sectors such as butchery and ensure that they are bid for by combining them with more high volume sectors.

The crown must retain ownership of all structural elements. Only content (videos, lessons plans, presentations, example assignments) should be protected.

**Question 36: 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?**

Competitive bids should contain evidence of extensive domain expertise (as a specialist awarding organisation) and long term financial sustainability. This may prove to be an issue with more specialist/niche areas.

Sector knowledge is not always in house at the moment and should continue to be bought in as and when required.

**Question 37: Are there other variables (in addition to those listed in the text above) that could influence the return on investment for AOs? How might these factors influence interest from the AO sector for initial and further competitions?**

Awarding organisations may have invested heavily in e-portfolio systems and other tracking systems.

**Question 38: Which of the proposed performance measures are most important? Please explain. Are there any other measures, such as student and employer feedback that should be part of the accountability system for T levels? Yes/No. Please explain.**

There are already too many accountability measures and not all are appropriate. Historically value-added progress measures have not been a reliable method of tracking progress from an academic base line on a technical programme (tech levels were removed from VA in 2016 for this very reason).

A combination of achievement rates and destinations/outcome based success measures should be prioritised instead.

It should also be noted that the inspection framework will need to be reviewed. A common inspection framework across remits is a questionable concept, made worse by the absence of reliable progress measures for technical education. A new and distinct framework is required for the skills plan era.

Audit requirements must be in line with delivery intentions, inspection and accountability requirements.

**Question 39: 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?**

The current system works well and could simply have an additional band for higher hours added.

The recent implementation of the partly formula driven work placement capacity building funding appears to be handled well by the ESFA. A similar system until we are in steady state could work.

**Question 40: How might we adapt funding flows to AOs to make sure that the full range of T levels is available to students around the country?**

Without further details of the T levels it is difficult to respond to this question. It is to be expected that awarding organisations will require qualifications to meet a minimum threshold business case, typically 500 registrations.

**Question 41: 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? Please provide evidence to support your response.**

The requirement to complete a work placement to achieve a T level may adversely impact younger students in rural areas or those from more socially deprived backgrounds who rely on public transport which can be expensive and not provide regular services. There should be a funding pot allocated to providers to help mitigate against this.

Some students, e.g. those with learning difficulties such as dyslexia and autism may well be able to complete and excel in a practically based qualification, but may struggle to sit and achieve external T level assessments including English and mathematics at level 2. There should be a process to ensure that these students are not unduly excluded from successful achievement.

48%<sup>35</sup> of students on current level 3 programmes progress from level 1 and 2. Colleges play a crucial role in social mobility, supporting students to progress through the levels and in some cases to higher education. These students are currently penalized in their final year, eligible for less funding than 16 and 17-year-old students. T level funding should reflect the role and positive impact of three or four-year programmes to student outcomes.

Association of Colleges

8 February 2018

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<sup>35</sup> ILR/Mides data