

Consultation on implementation of T level programmes – MEI response

The DfE is consulting on the implementation of T level programmes at

<https://consult.education.gov.uk/technical-education/implementation-of-t-level-programmes/>

This document contains the consultation questions and MEI's responses to each one.

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?

Yes

But it is vital that Core Maths is still funded – see our response to question 17.

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?

No – there should be approved *programmes* available at level 2 rather than *qualifications*. Otherwise a young person might pursue an approved qualification but not the right kind of maths or English to support progression. Perhaps this is best dealt with through the rules for funding post-16 level 2 programmes.

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

No

We restrict ourselves to commenting on the assessment of the maths element of the T level.

We agree that achieving level 2 in maths should be a minimum requirement for being awarded a T level. We note that this requirement may be met through achievement of either a GCSE standard pass or a level 2 Functional Skills qualification; we consider the current GCSE to be unsuitable for post-16 students and full details of the Functional Skills qualification are not yet available. We urge that a 'mature' GCSE in maths be permitted.

We are concerned about the assessment of any maths beyond the minimum level 2 requirement which T level panels recommend or which the Institute requires.

Our first concern is about the selection of this maths content.

- Sufficient expertise is required to select a coherent and deliverable body of knowledge, skills and understanding, building on a grade 4 at GCSE (say), rather than a few selected topics which the panel deems necessary.
- If different panels choose different bits of content then delivery and support of maths within colleges will be very challenging.
- A T level in a particular route will allow progression in a limited number of areas; it is the maths a young person does which keeps doors open to progression into other areas. Employers selecting maths topics which suit them may not be doing what is best for the young people taking the course.

Our second concern is about the assessment of this maths content. It seems to have been lost in the assessment of other parts of the T level. It is not clear from the paragraph immediately above question 3 in the consultation document whether the 'selected numeracy skills' are assessed in the external examination or in practical employer-set projects as part of the core employability skills. This vagueness concerns us. It would seem quite possible, however the maths is assessed, that a student could pass the assessment despite not succeeding at the mathematical elements; knowing this would mean that there may not be proper emphasis on the mathematical elements of the course (perhaps they are considered 'too hard') and so the maths is forgotten.

As a country, our aspiration is that all 16-19 year olds continue with maths rather than opting in. There appears to us to be a real risk that we are setting up a system for one category of young person (those doing T levels) where it will be very difficult to achieve this aspiration. We are fully behind the ambitious redesign of vocational education as represented by the introduction of T levels, but fear that the approach to maths is regressive rather than ambitious. What is required is an appropriate maths *qualification* for students taking T levels.

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

No

We agree that separating the core and specialisms seems sensible.

Using grades A* - E for grading the core component invites comparison with A levels; and if this is the case (intentionally or otherwise) establishing that such comparability is achieved is likely to prove impossible. Indeed, establishing comparability across pathways/routes will be very challenging. Indeed, given that an employer-set project contributes to this grade it would seem challenging to establish comparability even within the same pathway. The A* - E grade-set will give a false impression of certainty which cannot possibly exist.

The graded part of the qualification also represents something which is of a different size from an A level, and may be of a different size from the core component of other T levels. This again gives a misleading impression.

Our conclusion is that using the same grade-set as A levels is very misleading and should be avoided. Perhaps something like pass-merit-distinction-starred distinction (as in BTECs) should be used for all components.

The use of an A* - E grade-set may also lead to an accountability measure which will tempt colleges to only offer the courses with the easiest-to-achieve grades.

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.

No

Comparability only appears to exist for T levels with the same title. Employers are involved in grade awarding but there is no mention of Ofqual or anyone with experience in the very challenging area of comparability, other than in the broadest terms at the end of the consultation document. This seems unlikely to work: it is a very difficult thing to get right.

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

This sounds worth achieving in theory, but will be non-trivial to administer. It rather assumes that comparability is working well.

We note that the Awarding Organisation (AO) licence approach suggests one AO per occupation, but potentially different AOs offering qualifications with the same T level title; hence it would be possible for colleges to game the system – take the core elements of the T level route with the ‘easiest’ AO (aiming at a higher grade on the A*-E scale) then transfer to the appropriate occupation qualification for the remainder of the course. This is highly undesirable. We recommend that it is considered that only one AO is licensed per T level route.

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?

No response

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?

No response

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?

No response

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?

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?

No response

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

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

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

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

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

No response

Question 17: Should students be able to opt to take a higher level maths or English qualification e.g. core maths, A level 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?

Yes

We strongly support this entitlement for students, and would want to go further.

As outlined in the Smith review of post-16 mathematics¹, the government has the aspiration that all post-16 students should continue with mathematics, but this is not currently possible. It is vital that the T level reforms move us in this direction, and do not hinder the achievement of the aspiration. We must certainly allow students who wish to take a level 3 maths qualification to do so. Working towards a higher grade at GCSE might be appropriate for some students.

For individual students this is the only way in which the T level qualification can truly open up possibilities rather than limit them. Progression should not only be about the next stage, but the one after that, and about progression into other areas. Many young people who realise that they have made a poor choice (for them) at 16 will find that it is the maths qualification they have obtained which will keep doors open for them.

We would want to take this entitlement further in two ways.

- This entitlement must not be only about the national programme permitting this to happen within the design of T levels. There must be access for every student to an appropriate maths qualification whatever college they attend; to allow colleges (or other state-funded providers) not to offer this is a fast route to entrenching the regional inequalities and associated lack of social mobility which other programmes are trying to reduce.
- Taking an appropriate maths qualification must not just be permitted, it should be strongly encouraged for individual students. A maths qualification is a valuable way in which a T level programme keeps doors open.

A smaller point is that AS maths should be on the list of suitable qualifications as well as A level maths.

Issues for providers will include:

- funding; the course must be properly funded
- teacher supply;
- organising a course over 1 or 2 years when students are out on work placements for blocks of time

¹ <https://www.gov.uk/government/publications/smith-review-of-post-16-maths-report-and-government-response>

Please see our response to question 3 where we argue that the place of maths within the teaching and assessment of T levels seems rather poorly thought-through. Having a small range of well-designed, high-status and appropriate maths qualifications which students are strongly encouraged (and eventually required) to take will be of great benefit to individual young people and the nation.

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

We recommend Option 2, with maths and English funded additionally and the students having more hours of study per week. (If a student needs to study level 2 maths *and* English they should probably be taking the level 2 transition programme, so this only applies to students needing to study level 2 in just one of maths and English.)

This option seems the best way of guaranteeing the student the maths they need, and the most straightforward to provide in colleges. It also seems the best fit with allowing some students to tackle a level 3 maths qualification (eg Core Maths) alongside their T level while some tackle a level 2 maths qualification. Both should be appropriately funded.

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?

No response

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

Yes

It is not clear that any level 3 maths qualifications will be included here. It may help employers and other users if the student's highest level maths qualification is visible on the certificate.

The level 2 maths and English qualifications may well be from different awarding organisations. Is it clear that the infrastructure exists to draw together this information?

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

Yes.

All significant achievement should be recognised, including success in maths and English.

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

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

By making sure that maths is emphasised ... and that level 3 and other appropriate maths qualifications are readily available.

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| Question 24: What good practice already exists in enabling learners with technical (rather than academic) backgrounds gain access to, and succeed on, degree courses? |
| No response |
| 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? |
| Maintain the requirement that learners should achieve level 2 in maths and ensure that appropriate additional study time is funded, but remove the requirement that this should be (the current) GCSE maths. See our response to question 3. |
| Question 26: How should we adapt T levels for adults so that they meet the needs of adult learners? |
| No response |
| 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: |
| <ul style="list-style-type: none"> • 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 |
| Supply of maths lecturers/teachers, and training of others who will be teaching maths within their pathway, will be a challenge. |
| 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? |
| Question 29: How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching, and training other members of staff? |
| Question 30: What challenges will providers face if they want to bring in more industry expertise? |
| No response |
| 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? |
| Please note our response to question 17 for comments about the risks of regional variation in the provision of maths qualifications. |

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?

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

No response

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

Please see response to question 6 for a comment about exclusive licences to AOs.

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?

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?

No response.

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?

No response.

Question 38: Which of 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.

Yes

Performance measures only work if the grades between qualifications are perceived as comparable. The tighter the measure, the more likely it is that colleges will seek to game the system, by encouraging students into the 'easiest' routes/pathways or even into T levels rather than A levels, when this may not be in the best interests of the student.

Student and employer feedback is important because it can help the qualifications are taught in a manner which supports the students to succeed in the workplace, rather than just focusing on the assessment.

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?

No response

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?

No response