

GuildHE response to:

# Implementation of T level programmes Consultation

**FEBRUARY 2018**



## About GuildHE

[GuildHE](#) is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports.

### **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?

We agree that the three principles listed are the right ones, but we do not believe that government has a clear handle on the genuine skills needs of employers in the medium or long term and would not want qualifications culled from the system when there may be a genuine (but silent need). It is notoriously difficult to engage employers in telling the education sector what it needs, and in some sectors and regions where there are many more SMEs than large employers it would be impossible to canvas their views. We believe there are not enough processes in place for sector representative bodies to have engagement with DfE on the development of the qualification landscape. Individual employers will offer you a very personalised response to a skills shortage, whereas sector bodies who represent a larger proportion of employers will have a more well rounded view.

We are very concerned for example in the approach government is taking with regard to creative skills. The Creative industries are the UKs fastest growing industry, bringing in over £92bn annually. This is not just in the music, film and TV industry; all employers are crying out for creative thinkers, communications managers, design and marketing staff, website designers and digital skills, all of which need a strong curriculum which celebrates creativity. The current approach to GCSEs and school performance are dismantling creative education, and we have no confidence that this government is able to make a decision without prejudice, on what is ‘a necessary’ qualification is for workforce development.

We also believe that young people should be allowed to keep as many employment options open as possible. We do not live in a culture where children know what careers they want at 16, and the severe lack of infrastructure to support careers advice and guidance means that we are forcing children to

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decide their fates without any support. Removing qualifications to them may remove their choices later on in life.

We therefore believe that a principle of qualification reform must be to ensure access to a broad range of qualification types and subjects for all young people, regardless of background, which meets their aspirational needs, as well as those of potential employers. DfE must also speak more with sector representative bodies, rather than individual employers.

**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?*

We agree that not all students will be able to progress to L3 at 16, and that the national GCSE curriculum is not necessarily suited to providing students with skills for employment. Vocational L2 qualification will play an important role in helping these students to gain additional technical qualifications. But the review needs to make sure that there is a breadth of qualifications available to meet differing regional and personal needs.

It is also important to be mindful that Adults as well as young people have access to L2&3 qualifications to help them upskill or reskill. Any changes needs to take into account the differing reasons for undertaking the qualifications and ensuring equal access.

**Question 3: Do you agree with the proposed approach to assessing technical qualifications?**

**Yes/No** – *Please give reasons for your response.*

Where possible we believe it would be of benefit to young people to undertake a work placement, but in reality this will not always be possible due to geographical issues. Therefore there must be alternative arrangements made to gain these skills.

We would also like to see a variety in the assessment types used. There is little evidence to show that closed book examinations provide a better, deeper saturation of learning than coursework, portfolios and other forms of examination.

We are also concerned with the level of input individual employers will have on the development of these qualifications as opposed to sector representative bodies. The Apprenticeship trailblazer process has taught us that employers are not always able to work together effectively, and not always in the interest of their profession as a whole. We believe it is inappropriate for 10-15 employers to be able to 'represent' the whole sector and more sector trade bodies must be engaged in the articulation of current and future skills needs.

**Question 4: Do you agree with the approach to grading technical qualification components?**

**Yes/No** – *Please give reasons for your response.*

We are of the opinion that if the GCES system is moving to a 1-9 grading system then other national qualifications should also be graded in this way for continuity and for employers to better understand attainment.

We agree that there should be different grades for different competencies.

**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.

**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.

Learners need a way of having their prior learning recognised if they decide to switch pathways. It would be very unfair to make young people decide to study for a profession at such an early age without giving them a way to transfer if they decide that this profession is not for them. You should allow the recognition of prior learning if a pupil decides to completely change programmes for the same reason - not just if they want to tweak their choice. There will inevitably transferable skills between the 15 routes and these should be portable.

**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?

Government must realise that work placements will not always be possible depending on the location of delivery for the amount of time specified in the consultation. It would be unfair to stop a learner from gaining a qualification in a profession they wish to pursue just because they do not have access to an appropriate work placement. Rural locations will find this very hard to deliver on, as especially at this age learners will be reliant on public transport.

Government needs to undertake an impact assessment of this requirement based on geographical location and on social deprivation markers. Not all learners will have the luxury of being able to work for free for 60 days and this proposal seems to be at odds with other areas of government policy which are trying to stamp out the exploitation of young workers by not allowing unpaid internships. There is a big difference between work experience and internships; requiring learners to work 7 hours a day for 37 hours a week for at least two months as this consultation proposes is a definition of an internship, not a work placement.

We would also like government to further consider how it can protect the interests of learners in the workplace to ensure they are well supported, which means more investment may be needed to support employers to understand the needs of young people. We would also like to see how government will ensure that vulnerable young people, especially those with disabilities, young careers and those in care will be able to successfully access and complete a work placement, and that all learners have a way to highlight an issue if an employer is not providing adequate support or training experiences.

**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?

**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?

There is nothing mentioned in the document of how a learner can complain about their treatment at their work placement.

We recognise that the development of T Levels based on Standards produced by employers will make them particularly relevant for progression into Higher Level Apprenticeships. We would expect employer groups to include universities or consult with universities to ensure the content of the T Level is at a sufficient level for progression straight into Higher or Degree Level Apprenticeships, or traditional degrees as is the case for A Levels.

It would be particularly helpful if the IfA could facilitate discussions between trailblazers and T Level curriculum setters to ensure there are clear transition routes to Higher Apprenticeships programmes.

**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?**

There is no one answer to this question and each learners circumstances will be very different. For some they will not be able to commit to a 7 hour a day job, for others they will need to have their transport costs covered to get to their placement.

We believe it is fundamentally unfair to expect any learner to work for 2 months full time for free, even if these placements are not undertaken as a block. The school day is not 7 hours long, especially post 16, and schools and work placement providers need to recognise the current employment many of these students will already have, or learners must be compensated for loss of earnings from their employment for undertaking 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?**

In Higher Education we use many different approaches to ensure our students gain sufficient skills for their chosen profession. Masterclasses with professionals, days out at employers, online mentoring, skills workshops, 'live briefs' all contribute to students understanding of the professional skills required.

Live briefs are especially helpful as there is a real life client posing a real problem for students to fix. They have to liaise with the client to understand their needs and then go ahead and plan (and sometimes implement) their ideas to solve the problem. This is not very employer time intensive, but students get a real sense of what is required, and the employer gets to tell students what their expectations are.

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

We believe that all placement providers (or the school/college) has to cover the cost of travel and subsistence expenses. It should never cost a young person to gain the qualification to ensure fairness of the system.

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

Many will not have the support mechanisms in place to provide a safe and meaningful work placement to a young person under 18. Mentoring young people takes time, and time is money for many employers. They have no reason to engage in this exercise unless they are themselves in need of new staff or have a sense of social obligation. To get a breadth of employers to engage in this, they will (unfortunately) need to be incentivised to provide a good quality experience.

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

The arts - predominantly self employed/freelance SME businesses. It will be very hard for students to gain a meaningful work placement. Some parts of the industry (film and computer games for example) are very regionally rooted and will be hard to obtain if you live in different parts of the country.

Agriculture - it is very challenging to get to the locations of employers because of their rural locations where public transport is often scarce. Many micro businesses/SMEs in the sector which means it is less likely employers will have the capacity to support a young person.

Rural/Costal - young people will find it very challenging to use public transport to get access to meaningful work placements, and this transport will be expensive.

**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'?**

**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?**

**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.**

**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?**

**Question 20: Do you agree with the information we propose to include in the certificate?**

Yes/No – Please explain your answer.

The grading of T Levels should be split into three rather than two, to allow HEIs to see the grade for the Knowledge part of the T Level separate from the employer-set project. We would like to see more information about the expected academic content of the Knowledge, and would like UCAS to allocate tariff points to each part of the T Level. We have concerns about whether the T Level will have enough academic content to ensure that students can progress into higher education, or whether a bridging programme will be necessary, which may then put some off from progressing.

**Question 21: Do you agree that partial attainment should be reflected in the proposed transcript?**

Yes/No. Please give reasons for your response.

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

Government need to provide much more support to employers and sector bodies in the trailblazer process to ensure that there are adequate progression routes in place to L4,5,6 and 7 apprentice routes. If T Levels really do provide students with the necessary skills to gain meaningful employment it should not be a 'success' for someone who holds a T Level to enter a Level 3 apprenticeship as this is an equivalent qualification.

In order for students to progress, more higher level apprenticeships need to be developed and in our experience, these will not develop organically. Government must work with Sector representative groups not just individual employers to ensure that the right skills and the right occupations are being serviced by the apprenticeship route. There is a lack of a coherent strategy in the trailblazers to enable a clear progression route through the apprenticeship levels and this needs to be addressed for T Levels to be successful.

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

There needs to be the right balance between learning a skill and understanding the theory of the profession. There is a strange rhetoric surrounding technical education that it is not 'academic', but in order to be good at something you need to have a deeper understanding to innovate and problem solve. Therefore if the knowledge, skills and competencies are articulated and taught in the right way there is no reason why having a T level would restrict access to higher learning. But there needs to be a balance in different types of assessment to ensure a flexible student. It cannot just be assessed by written exam and practical exam, but many industry appropriate assessments including portfolio, presentation and team work.

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

Our members have a diverse intake of students with a variety of experiences and qualifications including BTECs. For us it is more important to have a talent for the subject, and a passion than having prior academic qualifications. This prior learning can be taught through access courses, Year 0 courses, additional support tutors etc. It is important that students who hold technical qualifications are not put off applying to universities, but there is a worrying narrative that there is a problem accessing HE with these qualifications, which there is not in certain providers and on certain courses.

For many, a transition to HE includes the completion of a Level 4 and 5 qualification, but there is a difference between prescribed HE at level 4 and 5 and non prescribed HE in terms of quality assurance and funding and this is a very confusing landscape for learners. We hope that the review of levels 4 and 5 will be working in tandem with the roll out of T Levels to ensure that these qualifications are a genuine bridge to HE.

**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?**

**Question 26: How should we adapt T levels for adults so that they meet the needs of adult learners?**

**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**

**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?**

**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?

Government should not restrict access to qualifications based on location or national need. We do not have a supply/demand approach to access to education in this country and if we did this would stifle social mobility. We believe that the skills agenda has been overly politicised, and not all sectors with skills shortages are being equally heard. The creative industries and agriculture are prime example of this.

**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?**

**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?**

**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?**

**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?**

**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?**

BTECs play an important role in enabling students to gain both technical and academic experiences in their chosen professions. We would not like to see an artificial divide created between technical and academic routes and believe that BTECs should still be funded to bridge these gaps for those students who value both.

**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?**

**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.**

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