

Implementation of T level programmes

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Response from the Sixth Form Colleges Association

The Sixth Form Colleges Association (SFCA) is the established voice of dedicated sixth form education and the hub of a national network of sixth form providers. SFCA represents 100 dedicated sixth form providers, including all designated sixth form colleges and a growing number of 16–19 academies, 16–19 schools and 16–19 free schools. A number of further education and tertiary colleges are also members of SFCA.

Principles of the T level programme

- The first question in the consultation asks if the principles set out in the document 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”*. But there is a much more important question that the consultation does not ask: is it right to present young people with a simple binary choice of qualification at the age of 16 – an A level or a T level? We do not believe it is. While the proposed simplicity may be appealing to policymakers, it has the potential to do enormous damage to the prospects of young people for whom neither route is appropriate, and could lead to an increase in the number of students that disengage from education altogether.
- Applied General Qualifications (AGQs) play a vitally important role in helping young people progress to university, and in developing invaluable skills such as problem-solving, team-building and communication. These qualifications are also extremely popular - 29% of the 429,364 students that [completed a Level 3 programme last year](#) were enrolled on an Applied General Qualification. Proposing a separate review of AGQs to see how they might fit into a future world dominated by T levels and A levels is the wrong approach and suggests that the outcome of such a review would largely be a forgone conclusion.
- A levels have already been through a process of reform (that included the removal of Applied A levels) and new AGQs were introduced in 2016 based on rigorous criteria set out by the Department for Education. T levels should be used to strengthen the third category of qualification (Tech Levels), not as way of replacing AGQs. Fundamentally, the two qualifications do different things: the former is primarily a route to higher education via applied learning, the latter is primarily a route to skilled employment via technical training.
- Diminishing the role and stature of AGQs would be a backward step for social mobility, skills development and curriculum breadth. More information on the value of these qualifications based on a roundtable discussion facilitated by SFCA between practitioners and DfE officials can be found [here](#). [Research commissioned by Ofqual](#) in October 2017 concluded that *“Applied Generals are seen to fulfil an important role in providing pathways for students not suited to, or not inclined towards, more academic or more vocational programmes at Level 3. In creative arts, ICT and sports related subjects, they can be preferred by HEIs over A-level”*.

Work placements

- It is right that a substantial work placement will be a major component of T levels. However, many institutions will struggle to secure a 45-60 day placement in an external workplace environment for every T level student. This blanket requirement is unrealistic, and the 'no placement, no certificate' approach is likely to act as a major barrier to increasing the number of students that achieve a T level.
- The funding for, and flexibility of, the Capacity and Delivery Fund (CDF) has been warmly welcomed by our members. Many colleges are planning innovative ways to increase the number of placement opportunities that employers are likely to offer in the future and creative solutions have already been developed (e.g. recruiting a shared work placement co-ordinator, offering employers the opportunity to open a centre within colleges). But the CDF is time-limited and it is not yet clear if the capacity building activity it is designed to fund will be enough to secure a 45-60 day placement for every student that needs one.
- The other implication of a 'no placement, no certificate' approach is that technical students will only be able to pursue a T-level in routes where local employers are willing and able to provide a placement. This will put students in rural areas at a particular disadvantage. Colleges in these areas already have to subsidise transport to get students to their institution, and arranging transport to work placements will create further financial pressures. Students that live in any community (urban or rural) without a dynamic labour market will find it harder to secure a work placement than their peers in more affluent areas. Young people's educational opportunities should not be limited by the nature of their local labour market.
- While there is some evidence to suggest that employers would like to recruit more 'work ready' students, there is much less evidence to suggest that employers are willing to come forward in sufficient numbers to provide work placements of 45-60 days in duration. As competition for placements heats up between providers, it is possible that a 'market' could emerge in some areas and several of our members have already expressed concern that this could result in paying employers for placements.
- In summary, greater flexibility should be introduced to the work placement requirement – perhaps allowing some of the hours to be delivered within the college. Some young people have to work on a part time basis to support themselves and/or their family. It should be possible to integrate this experience into a student's main work placement when it matches their chosen T level pathway. Consideration should also be given to providing additional funding to students that have to travel a significant distance to reach their placement. And greater flexibility needs to be shown to students with special educational needs and disabilities, as it may be more difficult to secure work placements for these students and to provide them with the support they need in the workplace.

Provider capacity and capability

- While the work placement element is one of the major challenges to the roll out of T levels, there are a number of other challenges linked to provider capacity and capability:
 - **Ensuring the right facilities and equipment are available.** On the whole, LEPs are effective at identifying the skills needs of local employers, but much less effective at engaging with Sixth Form Colleges to help meet these needs. They have funds to establish and expand facilities and should target investment in SFCs to aid T level delivery.
 - **Ensuring existing staff get high quality training and development:** It is imperative that the T level specifications are released in sufficient time, with sufficient detail, to give time for staff to prepare. Useful and well-resourced training courses, held across the country, would be very welcome. The move to linear A levels, or to the reformed applied general qualifications were not accompanied with a nationally-funded CPD programme and it is important that the same mistake is not made with T levels.

- **Ensuring appropriately trained staff are recruited:** There is a national shortage of teachers in almost every subject, and this is most critical in technical areas. As a result, some existing staff may have to be retrained, and additional funding will be required to deliver that (either via a national programme or at a local level). Employers and colleges will need to work in partnership to ensure there is the appropriate level of expertise and training within each sector. This model may be reciprocated by ensuring that college staff also have the opportunity to update their own skills and knowledge with placements back into industry.

Assessment and grading

- There is a logic to the idea of employer-led assessment, but in reality, not all employers are equipped to carry this out. Some employers currently struggle to do this for current 10 day work placements and asking more of employers may make it difficult to secure their engagement, particularly SMEs. It is also unclear how the employer assessments will be standardised – both employers and students should expect fair and standardised grading based on clear criteria.
- The proposed grading structure is confusing. An A*-E grade for the knowledge-based exam and a Pass/Merit/Distinction for the specialist component could lead to the former being viewed as an A-Level equivalent and the latter as the vocational alternative. The resulting combined grade (e.g. A/pass) will not help the prospects of a new qualification that has been designed to remove complexity, and could make it more difficult to achieve the stated objective of parity of esteem with A levels.

English and maths

- Additional funded hours should be provided on top of planned T-Level programme hours for those students without the minimum level of English and maths. Including them within the planned T level programme hours will disadvantage these students by giving them less time for technical study. It would be difficult to deliver English and maths to T level students alongside other students as they would have a different timetable to account for the external work placement – so it would not be possible to benefit from economies of scale.

Programme size

- There is an important point to be made about the size of T levels compared to existing academic and applied general qualifications. [Research](#) commissioned by SFCA has shown that the 15-17 hours of tuition received by 16-19 students in England is already well below the 25-30 hours received by students in other leading economies such as Canada, Singapore and Shanghai. The government was right to identify that students studying technical courses require additional support to succeed, but the same is true of young people studying A levels and applied general qualifications – particularly disadvantaged students.
- The decision to increase investment in technical, but not academic, education is also based on an incomplete analysis of the country's productivity challenge. The high-skilled economy envisaged in the government's Industrial Strategy will be driven by leaders, scientists, technicians, engineers and others that in most cases will have followed the academic path during their sixth form studies.
- Combined with the uncertainty that surrounds any new-to-market qualification, it is quite possible that some students will choose to pursue existing qualifications that have a proven track record *and* will allow them more time for part time work, caring responsibilities or leisure activities. The introduction of T levels in their proposed guise could have the unintended consequence of increasing the number of young people that pursue academic qualifications. To date, students appear to have had very little engagement in the development of T levels, something the government should address as a matter of urgency.

More information

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