

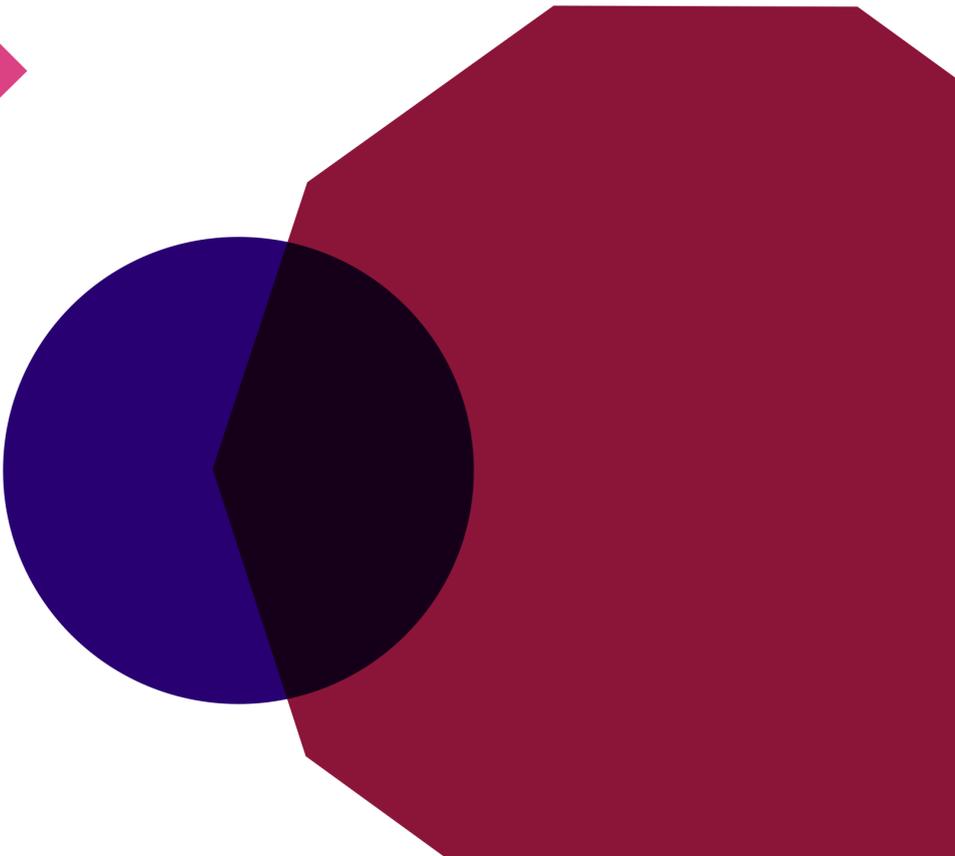
# T levels consultation response

A summary of our thinking



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## Introduction

City & Guilds agrees that technical education has the power to transform skill levels in this country and help respond to the challenges we face with poor productivity, rising skills gaps and skills shortages. For it to deliver on this promise, technical education needs to be improved and we support the Government's intentions to reform technical education and put it on a par with academic education as a high quality route through to employment.

As a provider of skills education for 140 years, we have seen enormous changes to skills education. Arguably there have been too many changes over the past 30 years with successive Governments tinkering with the system and unwittingly breaking the natural links that exist between high quality technical education and employment. Our report, *Sense & Instability: three decades of skills and employment policy* found that in 2016 there had been 65 Secretaries of State responsible for skills and employment policy in a thirty year period (compared with 19 for schools policy and 19 for higher education). This has now increased with the change to Damian Hinds.

There are several relevant, recent examples of well-intentioned false steps in the vocational space from which lessons must be learnt. For example, the 14-19 Diploma (to which structurally, the proposed T level programmes bears resemblance) which foundered after only a few years, leaving learners with a qualification which employers do not understand or value and which wasted large sums of public money on development costs. We want to help make sure that T levels policy avoids any such pitfalls.

If this much needed reform is to be successful then it's crucial that time is spent in getting the implementation right and giving another big change in the system time to bed in and be recognised by all.

In responding to the consultation, we sought the views of provider and employers as well as those in the wider education sector. We felt it was particularly important to represent the views of employers who will be the ultimate beneficiaries of these new qualifications, in the form of a better skilled workforce. Contributors from the City & Guilds Industry Skills Board (ISB) and Quality Standards Committee (QSC) have been listed in the appendix.

## Our recommendations to Government

### 1. Be clear about the purpose of T levels and how they differ from and complement the existing offer

ISB: 'There isn't enough clarity behind the purpose for T levels and what problem the Government thinks T levels will solve. As an employer, what is the value proposition of T levels? What are they actually bringing to businesses and what are they giving young people that doesn't already exist?'

Government must make the purpose of T levels clearer and more distinct from that of apprenticeships. Employers have told us that they don't yet see enough distinction between T levels and apprenticeships or why a T level student would then progress onto an apprenticeship. This is particularly relevant in industries where a level 2 rather than a level 3 apprenticeship is required for entry.

### 2. Make T levels attractive to young people, parents and employers

As above there needs to be a clear reason why someone would choose to take a T level and the progression into and out of T Levels needs to be clear, without closing off any routes. We know from experience that it takes time for new qualifications to be trusted and taken up. We feel the current proposals on grading could become a barrier to take up.

QSC: 'An additional concern is the promotion and marketing of the qualifications to have parity with A levels. Well before their introduction, there must be agreement of how they compare in terms of tariff scores with other qualifications so that parents and young people can gauge their value and see their relevance as part of a learning pathway. Parents are very important to this and they need to be aware at option choice time of how well T levels compare with other qualifications. Fudging this will lead to low uptake.

The proposed approach to grading is also overly complex and we believe that there should be consistency with A Levels to encourage take up of T levels. Those we consulted favoured grading the Core: A\*-E and Specialisms A-C.

The time to market T levels is now. Students from 14 (year 9) will need to be aware of T Levels so that when they are making choices at 16 they fully understand these choices. Current year 9s will be the first cohort to take T levels when they are introduced in 2020 and so need to be made aware of them soon.

Marketing a completely new qualification takes significant investment and time and we recommend DfE considers delaying first teaching to 2021 to allow for sufficient time to promote T levels.

### 3. Think holistically about technical education and focus on progression

Apprenticeships have undergone sweeping reforms with the introduction of standards and shift to employer ownership. There needs to be joined up thinking across technical education so that young people can progress into T levels and onto apprenticeships without repeating content.

There is a danger of looking at progression across all industries when in reality the needs are different by sector. Across hospitality and catering, entry level jobs don't require level 3 qualifications and there would be instances where a T level student graduating with a level 3 qualification would then be put on to a level 2 apprenticeship - effectively progressing backwards rather than forwards.

We would urge the Government to look at the skills needs by industry and not discount high quality qualifications at level 2 that provide people with the right skills for entering certain industries and Apprenticeships.

The full range of progression routes for any T-level must be planned, fully available and clearly set out for potential students, parents, providers and employers before that T-level is offered. Students cannot be expected to sign up for programmes where the options for subsequent progression are unclear or not yet available. There should also be options to progress into non-technical higher education to make T levels as attractive as possible.

### 4. Focus on the common employability skills T levels can develop

The evidence is clear that there needs to be a much greater emphasis on employability skills in education. The T levels give us an opportunity to design a programme that provides a consistent and robust approach to teaching and assessing employability skills, and employers told us that it's essential to get this right. The employers we spoke to said:

'The proposals around the core skills are currently not broad enough and there needs to be an agreement on what the core employability skills are that young people need to gain in education. There are plenty of frameworks out there so let's just pick one and agree this'.

'Rather than designing the core around the individual technical qualifications, we believe the emphasis should be flipped to focus on the common core that cuts across all T levels'.

'This would be a new way of designing the qualification but with the focus on education that supports people into employment we have a real opportunity to get out of the silo thinking and subject specialisms that typify qualification design and instead focus on the broad employability skills that all students need to gain'.

We believe there should be a common framework for employability skills and also a common way of assessing these skills. Clearly employability skills are more appropriately assessed in the workplace when they are put into action than in the classroom and we believe the work placement element, and not the extended project, should be used to assess these skills.

## 5. Employer involvement is important but don't assume they can do everything

Employers know best what skills and occupational competencies they need and we support a move towards increased employer involvement in the system to ensure it meets their needs. However, they don't have the time or the expertise to design qualification content and assessment and this should be left to the experts who have proven experience in developing technical qualifications.

QSC: 'We should be careful about how much we ask employers to do - they do not have the competence to design qualifications and their assessment strategies - this is a job for technical experts.'

An enormous burden of responsibility has also been placed on a brand new and as yet unproven organisation, the Institute for Apprenticeships (IfA). We believe there are too many conflicts of interest in the IfA taking the role of regulator, contract holder, lead development agency and sole certification body which has the potential to undermine confidence in the system. There needs to be independent regulation of the technical qualification component by Ofqual which would also be recognised through a separate qualification certificate.

## 6. The work placement is what sets T levels apart - it's too important to get wrong

Including a robust work placement element in T levels is an exciting proposition as it sets the programme apart from other classroom-based offers. However, there is a risk that this will fall flat unless proper investment and support is put in place. Employers have told us that they will really struggle to offer work placements without support and investment from Government, particularly for SMEs who don't have the resources available to manage such programmes.

There is also a risk that the work placement turns T level success into a postcode lottery with people unable to access placements and therefore complete a T level based on where they live.

We believe solutions to delivering the work placement must come from the demand side (ie employers) as well as the supply side and there needs to be flexibility in the timing and type of work placements to suit different sectors.

This is an area where the Government could link with other policy initiatives: for example the sector deals in the industrial strategy which include employers working collectively to address issues such as poor productivity, skills gaps and shortages could include a commitment from employers to offering work placements. Or a broadening of the apprenticeship levy could see a portion of it redirected towards supporting employers to offer work placements.

## 7. Don't underestimate the role of awarding organisations in maintaining quality in the system

The Government has rightly decided that employers need more input into technical education and has focused on consulting with them and giving them a big role in designing qualifications. However, awarding organisations are experts in designing qualifications and assessments and are focused on maintaining and improving quality in the system. There is a real danger that the awarding organisation infrastructure will be lost as a result of transferring copyright which will leave the system open to a reduction in quality.

Awarding organisations are bringing their extensive expertise, experience and investment to creating new qualifications and support materials for the benefit of learners and employers and as such should retain copyright of all qualification assessment and support materials. This would maintain a consistent approach across the rest of the qualifications system - General Qualifications, Applied Generals, Technicals and Apprenticeships.

Similarly, the T levels certificates should be clearly marked with the name of the awarding organisation, alongside that of the Institute for Apprenticeships. Launching a new qualification is a risk and it will take time for it to be recognised and respected by educators and employers as well as time for learners and their parents to see it as an attractive option. Launching a new qualification under a respected and well-known brand such as City & Guilds will help to more quickly establish T levels as a viable alternative to A Levels.

# Appendix 1

Our Industry Skills Board (ISB) in particular has provided commentary on elements of the T levels and we have included this throughout the document. The ISB also provided an active voice during the apprenticeship reform, including a report Making Apprenticeships Work, which included several suggestions that have been subsequently be implemented by Government. Membership of the ISB includes:

Chair: Andy Smyth, Early talent and apprenticeship manager - TUI

Anthony Impey, Founder and CEO - Optimity

Dominic Gill, Apprenticeship lead - Microsoft UK

Jane Hadfield, Talent for Care Programme Manager - Health Education England

Jo Bradford, Apprenticeship Manager - Marston's plc

Karima Khandker, Head of Heathrow academy - Heathrow airport

Kathryn Porter, Director of youth strategy EMEA - Hilton

Lizzie Crowley, Skills advisor - CIPD

Mark Lavington, HR Manager - PGL travel

Mark Maudsley, CEO - GTA England

Nicky Taylor, Head of learning & development - Tulip Foods

Sam Donohue, Senior Nursing Policy Manager - Health Education England

Scott Bell, Apprenticeship programme manager - Laing O'Rourke

Warren Page, Apprentice manager - Xtrac

We also drew on the expertise and advice of our external Quality and Standards Committee which acts as an independent advisory panel for our quality assurance procedures and risk management. They are the final point of judgement for our appeals process assuring full integrity of assessment judgements. The QSC provides an ongoing reference point during the apprenticeship reform, including feedback on emerging standards and assessment plan creation and the roles of EPA and EQA organisations in relation to the IfA quality guidance. Membership of the QSC includes:

Chair: David Sherlock (CBE), Writer, Ex QCA, NIACE, GTA, ALI etc

Peter Connelly, HM Inspector and Lead Officer Post-16 Reform, Education Scotland

David Jones (OBE), Chief Executive, Coleg Cambria Group

Marie-Therese McGivern, Principal and Chief Executive, Belfast Metropolitan College

Jasbir Dhési, Principal and Chief Executive, South Cheshire College

Prof. Prue Huddleston, Professor (Emeritus), Centre for Education Studies,  
University of Warwick

Isabel Sutcliffe, Independent International Education Consultant

Mark Barber, Head of Academy Operations, Securitas Security Services (UK) Ltd

Nicola Parkinson, Development Director, Jigsaw Training

Col. Andrew Deans (MBE), Assistant Head Through Life Development, MoD

Steve Fowler, Managing Director, Amarreurs