

Response ID ANON-YRQW-NZ45-4

Submitted to **Implementation of T level programmes**

Submitted on **2018-02-08 19:31:56**

Introduction

1 What is your name?

Name:

James Kennelly

2 What is your email address?

Email:

jkennelly@aqa.org.uk

3 What is your organisation?

Organisation:

AQA

4 Would you like us to keep your responses confidential?

No

Reason for confidentiality:

Principles of the T level programme

5 Do you agree that the principles outlined above are the right ones on which to base a review of level 3 qualifications we should continue to fund in the new system, alongside T levels and A levels?

Yes

If no, what other principles do you think we should consider? :

We believe more detail is needed. In particular, the phrase 'good quality' needs to be expanded to make it clear whether this refers to the learning programme or the assessment.

We suggest that the principles should be accompanied by further information which addresses the quality of programmes and provision. In addition, further principles should be added that address individual student needs or experience in some way.

6 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

If no, what other principles do you think we should consider?:

We agree in principle, if 'have a value in their own right' is taken in its broadest meaning.

There is an assumption in the document that students who need level 2 qualifications will either have additional support needs of some kind or will simply need a little more time to progress to level 3 qualifications and occupations. Research in various systems/countries, including different systems in place in parts of the UK at different times, shows that the situation is not as straightforward as this. Not all students will progress to level 3, and not all jobs require level 3 qualifications. So it is how level 2 qualifications 'have a value in their own right' that is the most important part of this statement. At this level in particular, principles should address the individual needs of the student.

The technical qualification

7 Do you agree with the proposed approach to assessing technical qualifications?

Yes

Please give reasons for your response.:

It is appropriate to assess underpinning knowledge through an examination, practical employer-set projects and other teacher-assessed tasks. However, some more information is needed on the proposed assessment of core employability skills, and how the 'employer-set' nature of these would work.

We have some concerns about the core employability proposal which will need a very clear and robust quality assurance process to ensure comparability across projects and providers, as well as potential issues around malpractice risks. There are potentially blurred lines between core theories and specialisms that could lead to difficulties in assigning elements to the correct part of the qualification.

Also, reference is made to the importance of ensuring a breadth of coverage in the core element. Dependent on the detail of intended implementation, the use of a 'threshold' to summarise attainment may be incompatible with this aim with a compensatory approach being more appropriate.

8 Do you agree with the approach to grading technical qualification components?

No

Please give reasons for your response.:

We assume that the two different grading systems are proposed because the qualification sits between general and occupational qualifications, and therefore using the grading system of each will help to link in each direction. However, using two different grading systems in one qualification is over-complicated and will confuse qualification users.

We propose an over-arching grade for the qualification similar to the Baccalaureate grade while retaining the separate grades for the components. This would allow for differentiation while the retention of separate grades for the elements would give a clearer picture of how candidates had performed across the qualification. This would be a third alternative to the two options discussed in the technical design annex and would allow the two approaches to be combined.

We also propose separate grades for the two parts of the core as they are assessed in very different ways.

9 Do you agree with the approach to maintaining comparable standards of performance for technical qualifications?

No

Please give reasons for your response. :

While we agree that employers should be involved in supporting standardisation, this will be difficult to achieve in practice. Consideration should be given to this aspect taking place at a national level and not within individual awarding organisations.

Similarly we agree with the aim for comparability of standards across providers and years, the details of how that would be achieved are needed before it is possible to comment on their feasibility.

10 Do you agree that prior attainment of the core could count if students switch to another T level within the same route?

Yes

Please give reasons for your response. :

Consideration should also be given as to how much of the core could be made common across different routes. This could operate in much the same way as transfer of credit currently operates within unitised GCE qualifications. There would need to be a clear statement of where it would be permissible and where it would not

Work placements

11 Do you agree with the proposed approach integrating the work placement within the T level programme?

Yes

If no, what would be a preferable approach?:

While we agree in principle, we have serious concerns about how this will work in practice, even with additional funding for employers. It will be particularly difficult in industries dominated by SMEs where the employer is not likely to have a separate HR or training function.

In addition, in some industries the nature of the work placement would need to be constrained in order to protect the health and safety of the students, colleagues, clients or customers. In such industries, it may be difficult for a work placement to provide opportunities for students to apply their technical skills and specialist knowledge. In those instances, a simulated work environment may provide better learning opportunities, and it is important to note that many providers already offer high quality simulated work environments.

The proposals also fail to take into account the widely-differing opportunities that will be available in different geographic locations. While a large and varied range may be available in the industrial conurbations of the South East, the West Midlands and the North West, provision will be far more difficult in more rural areas, such as Cornwall, the English counties along the Welsh Borders and Northumberland.

12 Do you agree with the proposed method of appraising the student's performance on their work placement, including the Employer Reference?

No

If no, what would be a preferable approach?:

The proposed approach is likely to be resource-intensive for both providers and employers.

13 Do you agree with the proposed approach to quality assurance set out above?

No

If no, please explain how we can ensure work placements are quality assured?:

The onus appears to be on the provider to quality assure the placement, which again sounds very resource-intensive and may be difficult for providers given that they are likely to need to maintain a good working relationship with their local employers leading to unreliability in the assessment.

The role of Ofsted needs to be explained. The reference to whistleblowing is to be welcomed, but suggests a need for greater safeguards.

14 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?

Please provide your answer below:

In theory, all students should be given opportunities to access work placements and reasonable adjustments should be made to allow them to do so. Additional funding for providers is mentioned; it will be important for this to be adequate to support this important requirement.

15 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?

Please provide your answer below :

A greater range of placements could be made available via provision of simulated workplaces.

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

Not Answered

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

Please provide your answer below:

18 How do these challenges vary across industries and location types?

Please provide your answer below :

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

Please provide your answer below:

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

Please provide your answer below:

Maths, English and digital

21 Should students be able to opt to take a higher level maths qualification e.g. core maths, A levels 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?

Please provide your answer below :

It is important that programmes of this sort maximise opportunities for students to develop transferable skills and do not artificially cap individual achievement in these areas. This would, though, make it more difficult and expensive for providers to deliver. High quality open learning or online learning materials may be helpful.

There needs to be clarity that additional qualifications in the academic provision (GCSEs and A Levels) will be provided by those awarding organisations already offering those qualifications and not those providing the technical qualifications.

22 Which of these options for funding Maths and English within the T level programme do you think would be the most appropriate?

Not Answered

Please explain the reasons for your answer. :

Additional requirements/qualifications

23 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?

Yes

If not, why not?:

We agree by exception when necessary. There needs to be more clarity about whether occupation-specific qualifications are required as part of the technical qualification and are awarded by relevant professional bodies. If this is the case then it could be difficult to implement by an awarding organisation that is not also able to award the occupation-specific qualification. We suggest that this be a separate element of the T level (i.e. separate to the technical qualification).

Certification

24 Do you agree with the information we propose to include in the certificate?

No

Please explain your answer. :

We do not believe that maths and English achievements should be included on the certificate as they will already have been included on other certificates published by the relevant awarding organisation. Where the maths and English requirements have been achieved outside the scope of the T level programme it seems strange to include them on a certificate of what has been achieved during the T level programme. The certificate should be a statement of what has been achieved as part of the T level programme.

In addition the consultation appears not to have considered the following issues in relation to the certificate:

- "Ownership" of the results;
- Ownership of copyright e.g. GCSE;
- The very complex and challenging logistics around the production of a certificate featuring results and outcomes awarded by a range of awarding organisations.

Suppose, for example, each element of the learner's attainment has been awarded by different awarding organisations? What mechanism exists to enable the Institute for Apprenticeships to consolidate all of those results and enable an overarching certificate to be issued? It would be highly advisable for the lessons from the Diploma Aggregation Service to be considered.

25 Do you agree that partial attainment should be reflected in the proposed transcript?

Yes

Please give reasons for your response. :

It is important to provide a record of work completed so that students can use this to help their progression at a later date.

Flexibility and progression in technical education

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

Please provide your answer below:

Maximising common content and allowing full credit transfer would appear to be the most obvious way to do this.

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

Please provide your answer below:

Achieving this aim may conflict with achieving the aim of allowing learners to progress to apprenticeships. We suggest that a primary progression route should be decided, with progression to the other route provided by top up or additional learning and qualifications.

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

Please provide your answer below :

There are many examples of access programmes that allow learners from vocational/technical routes to progress to and succeed on degree courses. Research suggests that such learners may require additional support, perhaps in the form of bridging courses to top up underpinning knowledge or courses to provide a grounding in independent study skills. Research also shows that for such learners, personal circumstances may play a large factor in determining success and a greater degree of pastoral support may be needed. Consideration of factors such as familiarity with a university environment or difficulties in travelling far from the student's home base has also been part of successful programmes.

Meeting the needs of all learners

29 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?

Please provide your answer below:

Key design features of existing successful programmes should be considered here. These may include development of broad, transferable skills (such as English and maths), reinforcement of appropriate workplace behaviours and attitudes, and provision of taster courses to allow learners to try out different vocational/technical areas.

30 How should we adapt T levels for adults so that they meet the needs of adult learners?

Please provide your answer below :

In this respect, the inclusion of functional skills qualifications as alternatives to GCSEs in English and maths is to be welcomed. Consideration should also be given to ways to allow adults to gain credit for their prior experience, particularly in respect of the work placement element of the programme. It may be that adults would be better taught in separate groups from 16-19 year olds and this may require additional funding.

Procurement and contracting of qualifications

38 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 provide your answer below :

The issue of copyright ownership is closely related to the issue of which organisation bears the qualification development costs. If these are to be borne by the awarding organisation, a requirement to then cede copyright in these materials is unlikely to be financially attractive. If the costs are to be borne by the Institute, the position may be different.

It is somewhat surprising that the sole question around the issue of market reform relates to copyright. There are other, very significant, issues in this area which would appear not to be covered by the consultation, including:

- The risks to delivery of having single providers ;
- The timetable for introduction, and considerations of how realistic it is;
- Challenges around bidding when the qualification content is unknown; it is unlikely to be possible to accurately cost development and delivery without this core information;
- The enormous variations in likely entry cohort sizes across the pathways, which will almost certainly lead to a very varied range of opportunities for awarding organisations, and a highly variable appetite for pathways.

There are many complex elements in relation to market reform which, we would suggest, require further detailed discussion before an implementation timetable can properly be finalised.

39 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?

Please provide your answer below :

Too many of the key details around the operation of licences are unknown to enable full answers to be given to questions 39-41. However, our experience of delivering 14-19 qualifications on a national scale, and our experience of developing and redeveloping qualifications for national delivery, suggests to us that the scale, reach and resources required will mean that only a limited number of organisations, or groupings of such organisations, would be able to mount realistic bids. Our experience of the costs of qualifications development suggests that an incumbency of a minimum of five years would be absolutely necessary. This is likely to mean that incumbency advantage at the end of that period will be overwhelming, even in the event of other possible providers having remained in the marketplace.

40 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?

Please provide your answer below :

See the answer to question 39.

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

Please provide your answer below:

See the answer to question 39.

Accountability

42 Which of the proposed performance measures are most important? Are there any other measures, such as student and employer feedback that should be part of the accountability system for T levels?

Yes

Please explain :

If the stated aims of T levels are that they have a distinct purpose, are good quality, and support progression to good outcomes, then performance measures should provide assurances that each of these aims has been met.

The views of employers are key in the first of these aims, and involvement and support of employers is vital, so their feedback should form part of accountability systems.

The aim that T levels should be 'good quality' requires further definition before a performance measure can be defined, but caution should be exercised before including an attainment measure: doing so for a qualification with significant teacher assessed elements brings well-documented risks of malpractice.

Destination measure would seem to be central to the purpose of T levels, and whilst we appreciate that these data are not routinely collected for every progression route, consideration should be given to developing systems for doing that.

It would make sense if at least one of the aims of T levels related to the benefits for individual students, and if so, then it would also make sense for student feedback to form part of accountability mechanisms.

Funding

43 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?

Please provide your answer below:

See response to question 44.

44 How might we adapt funding flows to awarding organisation, to make sure that the full range of T levels is available to students around the country?

Please provide your answer below:

The constraints that the intended market reform will impose on cross-subsidisation of qualifications are very unlikely to impact on the geographic availability of T levels. There are a number of reasons which might impact on this, most namely the differing opportunities for work placements.

The inability to cross-subsidise is, however, likely to have two very significant impacts. Some T levels with lower entry cohorts may find it challenging to attract any credible bidding for licences and the prices for T levels will see very significant variation making the qualifications financially unviable.

Equalities

45 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 your answer below and evidence to support your response:

Qualifications bodies have a duty not to directly or indirectly discriminate in conferring qualifications, and to make reasonable adjustments for people with disabilities. However, they must balance the need to avoid discrimination with securing public confidence in the qualification and ensuring that the expected knowledge and skill requirements are met. In doing so, qualifications bodies need to give due regard to the nature of the specified knowledge, skills and competences and whether these are essential to the qualification or not. This will be especially important for the practical components of the qualifications.

In addition, the requirements of the Equalities Act 2010 apply to all employers, suggesting that knowledge of these requirements should form part of every T level programme, perhaps as part of the knowledge to be developed and applied through the work placement.

Marketing materials and learning support materials for all qualifications should advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not by providing and promoting positive images and ideas.