



Confederation of School Trusts

Implementation of the T level programmes

Response of the Confederation of School Trusts

A Introduction

- 1 The Confederation of School Trusts (CST) represents circa 1,000 academies, multi-academy trusts and foundation schools, representing joined up leadership across executive, governance and business leaders. We are the national organisation and sector body for school trusts. This places us in a strong position to consider the National Education Service from the viewpoint of the system's executive and governance leaders in self-governing schools and trusts.
- 2 We are completely apolitical. We work with political parties and politicians across the spectrum to advance education in the public interest.
- 3 CST welcomes the opportunity to respond to this consultation.
- 4 CST broadly welcomes the recommendations in the report of the Independent Panel on Technical Education (known as 'the Sainsbury Report'). We believe it is important that the complex landscape of more than 13,000 technical qualifications is radically simplified. It is right that students will be able to choose from an academic study programme (primarily through A levels) and a technical programme (primarily through a T level or an apprenticeship).
- 5 However, we must ensure that there is perceived parity of the A levels and T levels by students, parents, schools, employers and the general public. There is a risk, for example, that T levels are confused "Tech Levels" which were previously promoted as the "technical alternative to A levels" and include many of the component parts of the new T Levels.
- 6 We do not feel qualified to respond to the section in the consultation document on procurement and contracting. We have responded only to the consultation questions we feel best qualified to answer. We have indicated these in the body of our response.
- 7 Our remarks are organised in sections as follows:

- A The principles of the T level programmes**
- B The components of the T level programmes**
- C Flexibility and progression in technical education**
- D Meeting the needs of learners**
- E Delivery of T levels**
- F Quality assurance and regulation**
- G Accountability**
- H Funding**
- I Equalities**
- J Conclusion**

A The principles of T level programmes

- 8 We broadly agree with the principles of T level programmes as set out in the consultation document (question 1). Clarity about progression to degree level higher education, higher technical qualifications, higher apprenticeships, degree apprenticeships and technical degrees is essential.
- 9 This is a significant change for providers and awarding organisations. It will be important to ensure funding is carefully handled and that the transition is managed effectively. We look forward to being consulted on the plan that the government intends to publish outlining next steps.
- 10 We support the principle that level 2 qualifications should support progression into employment or higher level study and have a value in their own right alongside T levels (question 2).

B The components of T level programmes

- 11 We agree with the broad framework and five components of the T level qualifications. However we would urge that the language of programmes, routes, pathways and specialisms needs to be clearly communicated – it has the potential to be confusing. We understand and accept that the ‘routed’ approach is designed so that young people can see a clear pathway to the occupation of their choice. However, this will need careful presentation to ensure that it is well understood.

- 12 The difference between the T level and the 'technical qualification' (a component part of the T level programme) also has the potential to cause confusion.
- 13 We agree with the proposed approach to assessing the 'technical qualification' (question 3).
- 14 We would raise a caution about the proposed approach to grading the 'technical qualification' (question 4). The consultation currently suggests grading the "core" element i.e. numeracy, literacy and digital as A* to E and the "specialism" or the vocational learning element will be a pass, merit or distinction. We wonder if two different types of grading systems for elements within the same qualification may be confusing.
- 15 We agree with maintaining comparable standards of performance for technical qualifications (question 5), but would again caution that what is being proposed is a complex grading system for this part of the T level and there will be a need to ensure that this is widely understood.
- 16 It seems fair that prior attainment of the core could count if students switch to another T level *within the same route* (question 6).
- 17 In relation to work placements (question 7), while we agree with the concept of integrating work placements within the T level programme, we would encourage that the government allow flexibility – a three month placement may be difficult for an employer, particularly, SMEs.
- 18 The Employer Reference (question 8) is a helpful component of the T level programme.
- 19 In relation to quality assurance, monitoring and reporting arrangements for the work placements (question 9), we all have an absolute responsibility for safeguarding, but we would caution against over-bureaucratic approaches.
- 20 We support the right of students with special/ additional needs to access all parts of the T level programme, including the work placement (question 10). In practice, work placements that require support or modifications will need to attract additional funding.
- 21 Questions 13 to 16 are best answered through extensive consultation with employers.
- 22 Students should have the right to 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 (question 17). If this were not the case, the T level would not be perceived to have the same status as A levels.
- 23 We support option 2 of question 18 - the commitment to provide the maths and English study for students who do not yet meet minimum requirements as additional funded hours on top

of their T level hours (with the hours funded from the overall T levels funding). It would disadvantage these students if they had less time for the technical qualification, and could result in the perception of a two-tier qualification.

- 24 There is a balance to get right by ensuring a student has a breadth of transferable skills, which they'll need to be able to move around job roles, sectors and industries *and* have a specialist set of skills that will allow them to do a specific job. Occupation specific requirements (question 10), for example a licence to practise, would be a desirable feature of the T level and should be incorporated where possible, but there may be occupation specific requirements that need to be completed separately. It is important that the government work with professional bodies to determine which T levels incorporate occupation specific requirements and to agree with professional bodies how these are to be obtained where this is not possible.
- 25 We agree with the information proposed for the T level certificate (question 20) and we agree that partial attainment should be reflected in the proposed transcript (question 21).

C Flexibility and progression in technical education

- 26 We need to ensure that employers do not question the value of recruiting a student who has gained a T level versus a student who has undertaken an apprenticeship. It may be reasonable for an employer to ask whether it is possible to fit what might otherwise been a four year engineering apprenticeship into a two year T level programme? There is a significant challenge to the new system to work out how can T levels be designed in a way that enables students to progress onto apprenticeships (question 22). It may only be possible to respond once T level content is known and mapped to apprenticeships.
- 27 In order to ensure that T levels provide a solid grounding for, and access to higher levels of technical education (question 23), a focus on the knowledge components of learning must be preserved. T levels should not become or be perceived as purely skills-based programmes.

D Meeting the needs of all learners

- 28 The DfE should identify best practice in the sector with regard to designing a transition offer to ensure that students can progress to level 3 study and particularly T levels (question 25).

E Delivery of T levels

- 29 Potential providers of T levels are best placed to answer the question about the biggest challenges for providers in delivering new T levels and what additional support providers will need (question 27).

- 30 It is imperative that students, parents, schools and employers understand T level programmes ahead of first teaching (question 28). Information raising and marketing should be begin immediately. T levels are not well understood in the school sector. It will be very important for careers and guidance professionals and teachers in schools to understand this significant change in technical education and be able to advise students accordingly. A range of information and marketing materials will be required for different audiences. For schools, sub-regional road shows should be commissioned with bespoke information provided for teachers. Professional associations such as CST, ASCL and NAHT could play an important role as information brokers to school leaders.
- 31 Potential providers of T levels are best placed to respond to questions 29 and 30.
- 32 The DfE should not seek to further influence which T levels are offered by providers, according to local and national skills needs (question 31). We live in an increasingly global environment where young people will make choices about where they study and live. It is limiting on career aspirations and our national productivity to drive young people into careers the meet the needs of regions or sub-regions in which they happen to be born. This may have the effect of entrenching disadvantage. The government should find other ways of addressing regional disparities.

F Quality assurance and regulation

- 33 We agree that under a single qualification model, assuring consistency in assessment and awarding of qualifications in education and training providers across the country year on year will be critical to the credibility and purpose of T levels.
- 34 We accept that under the Technical and Further Education Act 2017 the Institute has responsibility for setting occupational standards, commissioning and approving T level qualifications and maintaining the T level system. We believe it is unfortunate that this responsibility does not sit with Ofqual, which has a broad responsibility for regulating national qualifications which includes recognition of Awarding Organisations and the statutory powers and expertise to monitor both the standards of assessment and of awarding qualifications. It is absolutely essential that the two regulators, the Institute and Ofqual, develop a coherent, aligned and robust assurance system which is understand by providers, Awarding Organisations and the wider sector.

G Accountability

35 If parity between A levels and T levels is to be achieved, we need a common language. It is unhelpful that the consultation document states that “T levels are not just a qualification like A levels.” T levels are not just a qualification – neither are A levels in fact *a* qualification. T levels are a programme of study comprised of several elements and composite qualifications. An A level programme of study is also comprised of several qualifications. The more we can develop a common language across academic and technical programmes, the greater chance we have of assuring the perception of parity.

36 We would advise the accountability measures across the two programmes of study are at least broadly comparable (question 38).

37 We look forward to responding to Ofsted’s consultation on the specifics of their proposals.

H Funding

38 There is insufficient detail in the consultation document on funding proposals for us to make a full response to questions 39 and 40. We look forward to further detail.

I Equalities

39 The best equaliser of outcomes for all young people is an academically rigorous curriculum and a culture of high expectations regardless of personal characteristics, economic disadvantage or perceived intelligence. T levels must be (and must be perceived to be) academically rigorous. Ultimately when a cross-section of the student population make a positive choice in equal measure to study A level and T level programmes, we can be confident that we are advancing equality of opportunity (question 41). It is therefore very important that we monitor uptake of programmes of study at national, regional and local level to ensure that disadvantaged young people are not disproportionately choosing technical programmes.

J Conclusion

40 I hope that this is of value to your consultation. CST is willing to be further consulted and to assist in any way that we can.

Leora Cruddas

Chief Executive

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