MillionPlus

The Association for Modern Universities

CONSULTATION RESPONSE

DfE consultation on the implementation of T levels

February 2018

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?

MillionPlus would welcome any review that is thorough and fair in its assessment of level 3 qualifications to be funded alongside A levels and T levels. However, we would have concerns that the reforms will simply exacerbate the divide between academic and technical routes, by treating them as two distinct pathways from which a student at 16 years old should choose. We would be concerned that that narrowing of choice at 18 years old leads to a narrowing of choice at 16 years old leads to a narrowing of choice at 14 years old. The risk is that schools start to 'sift' students into particular areas of study based on their abilities and interest at a young age, or to achieve organisational efficiency in teaching.

MillionPlus member institutions have a long history of accepting a wide range of qualifications in various combinations at this level. We would therefore warn against any limitations that will be placed on the types of qualification that are available to those studying qualifications at level 3. This could create barriers by narrowing the options for those looking to progress to further study or skilled employment. This, in turn, might have serious implications for widening access which would undermine some of the governments objectives vis-à-vis social mobility. For that reason, it is important for there to be horizontal as well as vertical progression pathways if the reforms are to succeed.

MillionPlus would emphasise the role that the BTECs have played in supporting the widening of access to higher education. The qualification, which was not accepted unanimously by the sector at first, has shown create resilience over the years, offering alternative routes into further study for thousands of learners, young and old. Modern universities widely regard this qualification as a success story in terms of its capacity to offer a more viable vocational study pathway while strongly supporting the widening participation agenda. While there are questions over the volume of level 2 and 3 qualifications and consistency of standards in some areas it should be recognised that BTECs have been greatly values by individuals and institutions to date.

BTECs are also celebrated in the flexibility they allow for learners, since they can be used in combinations with A levels or other qualifications. If T levels do begin to "take off" and constitute a significant proportion of the qualifications taken at level 3, it is important that other options, such as BTECS, are still available to learners. The T Level proposals can be interpreted as a more rigid and employment-based structure, as part of the governments' attempt to improve social mobility and productivity. However, it is vital that the flexibility and choice of learners is not constricted through any changes. Taking into account the crucial role played by qualifications such as BTECs in widening participation in higher education, the government must be careful not to "throw the baby out with the bath water".

A better principle would be to consider how A levels and T levels can be brought together in one pathway, to encourage and enable students to develop a mix of skills, attributes and experiences in both academic and technical education to ensure their options for future study and employment remain as open as possible.

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?

All qualifications should have progression built into them. The popularity or take up of T levels could be damaged if progression is not built in. Level 2 learners will look to maximise their opportunities and are likely to avoid qualifications that do not have this built in as an option. Under these circumstances, it may be advisable to review level 2 qualifications. However, this will need to be done with caution, given that level 2 qualifications have only recently undergone a great deal of review and reform. We think it would be damaging to create a suite of qualifications that do not have progression to degree level higher education built into them.

MillionPlus does not have any issue with qualifications at level 2 having value in their own right. However, any review of level 2 qualifications should, as one of its main priorities, be working to avoid creating a system in which qualifications taken at level 2 are moulded exclusively for certain educational pathways. The government should be very wary that any changes made to level 2 qualifications that give too much direction into either employment or higher-level study could result in a binary education system in which students are funnelled into one of two routes: academic or vocational learning. This is problematic for a number of reasons. It supposes a false binary between the two areas. Many courses at modern universities are both academic and vocational. Furthermore, there are an abundance of workplaces and sectors in the economy that require both academic and vocational skills. It is vital, therefore, that students have some flexibility at this level, and that there is some room for manoeuvre should their goals or ambitions change. It would be unwise to create a system in which the decisions of fourteen and fifteen-year olds dictate their learning pathway irreversibly.

The proposals suggest that T levels are an end in themselves e.g. that they are primarily about moving into employment. This may be short-sighted. The current debate around skills is that employers are lacking people with level 4 and 5 skills/qualifications – indeed, the Department for Education is undertaking a review in this area during 2018. Suggesting that acquisition of level 3 skills is sufficient for moving into work may underplay the importance of higher level skills for the economy, particularly when considering the risks (and no doubt the opportunities) from increased automation. T levels should be seen as providing a foundation for further study and development, as A levels are.

Where there is mention of progression to further study, we believe that T levels shouldn't just be about progression to technical degrees or degree apprenticeships, any more than A levels should only be a route to traditional academic subjects.

Do you agree with the proposed approach to assessing technical qualifications? Yes/No – Please give reasons for your response.

MillionPlus has some concern over the proposed grading for T levels outlined in the consultation document. This is largely based on the dual grading system, offering two separate and altogether different marks or grades. MillionPlus has some concern that this system of grading may be unnecessarily complex and confusing for providers, at least at the outset of T levels, who are trying to make an assessment on the relative weight and attainment level of the qualification. It may also be difficult for employers to full judge competencies of potential employees.

The dual grading model allows a lot of room for interpretation for admissions services at universities who will have to make a judgment on the relative weight of each grade or component of the qualification. This could undermine a consistent approach towards the qualification across the sector, and likely result in acceptances

with T levels varying widely from one institution to another. It is also likely that this ambiguity may stall certain institutions from accepting students with T levels, falling back on the "safe bets" of qualifications that they have a good knowledge of. This may unfairly affect those who have taken T levels in the preliminary period and may have adverse knock-on effects in relation to take up in the cohorts who follow.

Do you agree with the approach to maintaining comparable standards of performance for technical qualifications? Yes/No – Please give reasons for your response

MillionPlus is in agreement with the approach to maintaining comparable standards of performance for technical qualifications. This would create some level of consistency and quality assurance across the breadth of different occupational specialisms. Moreover, it would also provide students that decide on a change of direction/area of specialism with more flexibility.

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.

The way the core modules are developed and structured needs to allow flexibility for any students studying T levels. If they decide they want to change paths and do A levels for example, is this core part accredited? In other words, can they use it as a platform to build on to do A levels? Or do they have to start again even after a years' worth of study? If there is no flexibility here, or options left open, there is a risk of creating a binary of vocational/academic that students will have to start thinking about well before level 3, as per our response to question 1.

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?

Work placements will inevitably increase the administrative effort required to manage T levels. MillionPlus has some concern that it may be very difficult to find enough quality placements for young people on a mass scale. Universities, even those with excellent records of employability resources and placements as part of undergraduate study, will emphasise that finding placements for a single university can be challenging (and these for more advanced/skilled young people).

There is also the issue of geographic inequality of opportunity. In some areas of the country, it will be much harder to find placements, and even when you do they may be of limited quality. Since T levels are proposed as a part of the drive to address the skills gap and regional inequality across the country, this could problematic. Regional disparities could simply be replicated/further entrenched by young people's opportunities vis-à-vis work placements.

Such effects would run counter to the government's stated objectives to tackle regional inequality and the goals of increasing social mobility and productivity in the economy which are linked to this. There is also a marked lack of clarity within the consultation document on the level of intensity of the work placement (responsibilities and projected development). Work placements will, of course, represent a huge range of workplaces and industries around the country and it would be unwise to expect to create one completely standardised model. Nevertheless, MillionPlus feels that the Department of Education could paint a clearer picture of what will be expected of a work placement with regards to quality of experience and intensity of workload. Not doing so would risk regional inequalities simply being reproduced on a national scale through these work placements. The management of quality placements will generate a significant overhead for organisations wishing to engage with these qualifications, and so the reforms need to take account of this when considering funding levels.

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?

We would recommend that extra considerations be made for those with caring facilities, either in the form of financial support or for larger providers of T levels, free or affordable childcare on site (i.e. sixth form college campus).

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?

MillionPlus is aware that universities, as employers, have been floated as one possible answer to this problem. Modern universities, including many MillionPlus member institutions, are locally-orientated organisations that were established partly as a response to the need of the local area, with regards to social mobility, productivity, skills and regional growth. As a result, these institutions often provide opportunity and employment in regions that are lacking in employment opportunities relative to other more prosperous areas of the UK. In this respect, some universities may be able to help in providing work placements where opportunities are otherwise limited. However, T level providers should by no means rely on universities as sources of work placements. The ability of institutions to cooperate on this front will vary from one university to the next. Furthermore, most universities will be resistant to any (further) encroachment of Ofsted into their spheres of operation.

Many universities with excellent records of providing employment (placement) opportunities for their students report on how much of a struggle this can be. Another avenue to explore would be using universities, who have extensive networks with local employers, as a gateway to finding work placements for T level students. However, once again, this will depend on the will of the individual institutors to offer up contacts and sources of collaboration. As for other employers, issues relating to insurance and cost of management will be a key factor.

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

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

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

From our perspective, there are two key issues raised in these three questions.

First, there appears to be limited involvement from higher education providers in developing the T levels. Employers, PSRBs and some providers are noted as being involved in the development in the T level Action Plan published in October 2017. However, it is not clear that universities, and especially modern universities are going to be part of this focus on expertise. Modern universities have long track records of delivering technical education at levels 4, 5 and 6, so as such will have a view on how to ensure level 3 qualifications are structured to enable progression.

When the reviewed A levels in 2014/15, a selection of Russell Group universities were part of the A level Content Advisory Board (https://alcab.org.uk). We believed at the time that this was arguably a restrictive approach, with the government only heeding advice on A levels from a small number of universities, but the broader principle of universities being involved in level 3 reform is sound. We would like to see universities –

in particular modern universities – involved in developing T levels, especially as the progression routes are largely in areas where moderns have significant expertise, specialisms and course offerings.

Our second point relates to progression, and is a point we have made in our response to question 2.

We think it damaging to create a suite of qualifications that do not have progression to degree level higher education built into them. That runs the risk of creating a binary system. We believe that T levels shouldn't just be about progression to technical degrees or degree apprenticeships, any more than A levels should only be a route to traditional academic subjects. We would be concerned that that narrowing of choice at 18 years old leads to a narrowing of choice at 16 years old leads to a narrowing of choice at 14 years old. Again, the expertise of modern universities can be brought to bear here, given their experience in supporting learners with a diverse range of qualifications to progress into appropriate higher education, and support them in that education.

There is also a general point about the narrowing of choice if Applied General Qualifications/BTECs are excluded from the mix offered to students. As we note in our response to question 1, these qualifications are popular and well-known, and there is a risk that potential students and employers will be negatively affected if the implementation of T levels suggests BTECs and other Applied General qualifications no longer have value. They have also played an important role in widening participation and increasing access to university, particularly since the abolition of the cap on recruitment.

There is also a particular risk for people already in the workplace, with these qualifications, wishing to develop their skills or re-skill to ensure they can progress in their career and contribute to improved productivity.

Modern universities have a great deal of experience dealing with students with a range of different prior qualifications (and with those without any) so would not necessarily be as convinced by blanket arguments about simplicity as some universities.

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

There is some mention of adult learners in the consultation document, which is to be welcomed. The section on adult learners (pages 31-32) outlines some of barriers and challenges that adult learners face with regards to study at level 3 and beyond. However, there is very little vision given as to how T levels could appeal to adult learners, nor how they can be adapted to suit their needs. Consequently, MillionPlus has doubts on the suitability of T levels for adult learners.

BTECs have been a popular study option for mature students in recent years. Research by OFFA has shown that 43% of students attaining a degree through the BTEC route are 27 or over. BTECs have been so popular with mature students partly because they can be studied with a high degree of flexibility, i.e. alongside other commitments, and also because they can be used in combination with other qualifications for progression into higher education. When you compare this to the proposals for T levels, which would be much harder to undertake alongside multiple existing commitments (work, caring responsibilities etc.), then it becomes clear that T levels might not have the same appeal or viability with adult learners.

The proposals for the implementation of T levels seem heavily focused on 16-19 year olds. In order to adapt T levels to suit adult learners, it is likely you would have to make some fundamental changes to the plans as they stand currently. Perhaps more important in the implementation of T levels, would be the assurance that other qualifications, namely BTECs, will not be neglected by providers, as a result of being "pushed" out by the introduction of BTECs. When you consider that adult learners are normally less geographically mobile

and more rooted in the community or region, it is of great importance that other, more flexible options are still on offer in every region of the UK after the introduction of T levels.