

Response ID ANON-YRQW-NZ6P-1

Submitted to **Implementation of T level programmes**

Submitted on **2018-02-01 14:53:26**

Introduction

1 What is your name?

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3 What is your organisation?

Organisation:

Nuclear Skills Strategy Group

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? :

However, we believe that any review of existing qualifications should come after T levels have been tested in delivery. Wholesale removal before people have become used to T levels risks leaving gaps in provision. The main concern about vocational qualifications is not whether there are "too many", but whether they meet the needs of UK industry and learners

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?:

The need for some qualifications to support Level 2 occupations should also be considered.

The technical qualification

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

Yes

Please give reasons for your response.:

The IFATE should make it an explicit part of the design process that it looks in detail at the End Point Assessments for relevant apprenticeships, to make sure that the T level assessments are as closely aligned as possible.

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

Yes

Please give reasons for your response.:

T levels are designed to be analogous to A levels, so it does make sense to have a comparable grading system from E to A* for the core technical qualification element. Employers will be able to decide for themselves whether, for example, a Grade E is suitable for their purposes, or to set other criteria in recruitment.

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

Yes

Please give reasons for your response. :

It will be vital for the reputation of T levels that grades have the same standards within and across routes, to avoid any suggestion that there are “easy” options.

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. :

Flexibility for students will be important while young people are making choices about their careers. For this to work, there will need to be a mechanism of on-course assessment to ensure that the student does actually have the core skills and knowledge from previous learning.

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?:

We recognise the value of the work placements in giving students practical work experience, and acknowledge that they could be useful addition in technical education routes for 16 to 18 year olds. Overall, for work placements to be sustainable they will need to be mutually beneficial to all parties (Provider, student and employer).

However, we have major concerns about the scale of placements required, the extra burdens it will place on employers and hence the ability to deliver. The recent decrease in apprenticeship levels since the implementation of the levy is indicative that some employers can be risk adverse with respect to new initiatives. It is essential that the work placement element gets employer buy-in to ensure there are meaningful opportunities for students, however significant resource will be needed.

The timing of work placements would need to be carefully planned versus employer capacity and activities. A good working relationship between the employer and provider will be essential so that both are aware of activity that would accommodate or preclude work placements taking place on site, and that as much notice as possible is given on both sides.

To be meaningful, work undertaken on placements will need to be explicitly linked to the learning objectives of the T-Level. Therefore, the expectations of the work placement need to be clearly defined and specific provider communication and support provided to ensure employers understand what needs to be achieved. However, flexibility will be required as:

- SMEs/smaller organisations may not be able to cover all of the learning objectives
- 'Real time work projects' are not controllable in the same way as classroom or lab projects

There are longer term benefits to employers in offering work placements which include:

- Ensuring students have practical experience
- A 'long' interview opportunity versus future apprenticeship/job opportunities
- Employer staff can benefit and expand their skills from the coaching and mentoring experience

These will need to be emphasised to encourage employers to offer work placement opportunities.

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

Yes

If no, what would be a preferable approach?:

Performance on the work placement will need to be assessed with input from the employer, the training provider and the student. For this to work in practice the process needs to be simple to follow, not onerous and agreed with employers after consultation. It also needs to be carried out consistently, so the use of templates is proposed.

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

Yes

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

Employers acknowledge that a safe working environment and quality experience for students is vital for work placements to be successful and that consistency and fairness across work placements is required. Consistent processes and templates will be required to streamline work place checks and reduce bureaucracy and time to a minimum. The work placement element is not a qualification and therefore some employers have proposed that the provider and employer can handle assessment

(provided there are good processes and unambiguous criteria available). Consideration will need to be given to support employers who do not have the resources/skills/expertise.

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:

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 :

Ideally, providers should be offering T levels that are relevant to their local employers and where there are apprenticeship and job opportunities post T level.

Colleges would be wasting their time trying to run T levels where there are few/no local work placement opportunities. Therefore, it is crucial that providers understand employer demand in their area.

However, students may wish to study subjects that they excel at and enjoy even if they are not locally represented, hence there is a need to look at alternative methods of accessing work experience. Students may be able to travel further afield, but if not, potential alternatives include:

- Catapult/innovation centres may provide alternative sources of work experience, if they have the capacity to offer work placements
- Simulated environments – although not ideal, there may be circumstances where they are necessary. Good quality simulators in the scientific, technical and engineering industries are sometimes scarce and expensive to access, so employers and providers who own them will need suitable compensation.

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

Yes

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:

The capacity of some employers to provide a work placement opportunity may be reduced for reasons including:

- Inability to offer meaningful work placements to students under 18, due to health and safety considerations
- No capacity to mentor and train due to lack of suitable staff
- No capacity to mentor and train due to number of apprenticeship and/or undergraduate placements already in place
- Inability to offer meaningful work projects in the time available
- Inability to provide projects linked to learning objectives of the T level

Employers' foremost concern will always be with the needs of their business at any given time, and they will not be able to sacrifice this to meet the needs of short-term placements.

Employers will therefore need to find capacity from internal resources or pay for additional staff to:

- Risk assess all site access (incl. Provider, Student, any other third parties)
- Provide induction training for students
- Plan and supervise work
- Review progress with students and providers, assess student and provide Employer Reference
- Liaise with providers to assess the working environment and to relate work to the T level learning objectives
- Escort students and training providers on site
- Undertake security checks for individuals accessing sites
- Agree with industry regulators that placements are suitably safe and permissible
- Backfill staff to perform work otherwise done by people doing all of the above

For these reasons, we believe that there should be some element of compensation offered to employers involved, where they need it.

We suggest that it should be one of the explicit aims of the pilots for T level placements to gather information about the real costs to employers of participation, and to determine suitable payment to reduce the burden. These costs will no doubt vary considerably by sector so that, for example, those in STEM and high hazard industries will have much higher costs than others sectors.

The costs and difficulty of having students in some workplaces (especially in high hazard industries) will mean that simulated environments will sometimes be needed.

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

Please provide your answer below :

Providing placements will be time consuming and expensive for some employers. This applies particularly to STEM industries and high hazard workplaces, where:

- access to site can be impossible for under 18s
- site visitors must be escorted at all times
- work on real projects requires a certain certified level of competence

Employers with multiple sites might be limited as to their involvement, because they would be unable to replicate the same level of support at each site due to economies of scale.

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:

The resources required to establish and manage a scheme like this might be better spent on good quality learning provision or supporting employers offering placements.

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?:

Where applied to a particular occupation or specialisation there may be a requirement for the learner to attain additional qualifications or certificates

Certification

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

Yes

Please explain your answer. :

The Certificate contains all pertinent information required to identify the learners qualified achievements, including any addition certification or qualification. Some might consider the Maths and English unnecessary on the certificate, as this is a given for all students and details of these achievement are listed in other documents.

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

Yes

Please give reasons for your response. :

There may be many reasons why a learner may not be able to complete the training programme. Opportunities should be made available for learners to complete their training at a later stage (perhaps with time limits).

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:

In the design stage, those designing T levels should take account of the content of all apprenticeship Standards in related occupations, with a view to alignment where possible.

We do not believe that students on a primarily classroom-based programme will develop their practical skills and behaviours to the same depth as those completing apprenticeships. (Although they could develop the knowledge element to the same level.)

Attaining practical skills and behaviours through classroom based learning depends on the following factors:

- Overall quality of the provider and their facilities and equipment

- Classroom theory to enhance their practical learning
- The nature of the practical projects and quality of supervision

We believe that students who have successfully gained a T level qualification (at level 3) should still be able to progress to a Level 3 Apprenticeship, if appropriate, in order to develop their skills and behaviours to the depth of an apprenticeship. This would be especially beneficial for workplaces where under-18s are not permitted.

In order not to repeat material already covered in T level studies, the apprenticeship would be of shorter duration than an apprentice starting “from scratch”, with credits for prior learning.

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:

We believe that T Levels should attract UCAS points for progression to Higher Education, comparable to similar relevant A Levels. This will help parity of esteem between the two routes. Bridging provision as mentioned in the consultation should be the exception rather than the norm.

Once the T level curriculum/route is agreed, the IFATE should assess the gap to be bridged to obvious HE pathways, to determine any bridging needed.

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 :

The T level could act as a ‘foundation level’ in a similar mechanism to a HNC/HND versus a degree course.

Delivery of T levels

31 What do you think the biggest challenge will be for providers in delivering new T levels and what additional support do you think providers will need? Specifically, ensuring:- the right facilities are available - the right equipment is available -appropriately trained staff are recruited, and in the numbers required -existing staff get high quality training and development

Please provide your answer below:

Facilities & Equipment

Some providers lack the space and equipment needed for offering practical science and technology/engineering training. These facilities and equipment are expensive and because the number of students in many regions is low, it is not cost effective for some providers to offer these courses. The answer could lie in specialist centres for the practical training supported by on-line knowledge courses based on a modular design. The practical elements could be addressed through block release sessions (e.g. summer schools or one/two week courses) at the specialist centre.

Trained provider Staff

Tutors with up to date and relevant industrial experience will be key to the success of T levels, and consideration will need to be given to as to how providers will have this level of resource.

For example, there would need to be a concerted recruitment campaign to provide the expert resource to deliver science or technology based T-level courses as the shortage of maths and science teachers/tutors is well documented. Part-time resource could help alleviate this problem, but support is required.

There may be opportunities to use expertise from industry on a guest lecturer or secondment basis, but there would need to be funding for industry for this to be universally available and sustainable.

The secondment of provider tutors into industry would increase their knowledge, but this is another challenge for employers as it is someone else to induct and train.

32 What information do you think will need to be provided to be able to market T levels effectively to students and parents and how far in advance of first teaching will it be needed?

Please provide your answer below :

We need to start now (2018) if teachers, parents and students are going to be sufficiently informed before the first cohort of T level students are due to start.

Information needs to include:

- Importance of technical education to UK economy: The technical skills needs of the workforce are changing rapidly and that process is only likely to accelerate as new technologies (automation, robotics, Artificial Intelligence, etc) become more prevalent and play a bigger role in the economy. Schools, students and parents need to understand the opportunities these technical advances offer through effective careers information.
- T level routes and pathways and what careers or HE these could lead to
- What T levels are, how T levels work (how taught, how graded, etc), provision
- How T levels compare to A levels
- Progression pathways available including links to Apprenticeships
- That employers are engaged

33 How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching and training other members of staff?

Please provide your answer below:

This can always be improved, but the nuclear sector has a good history of industry involvement in developing provider learning. The National College for Nuclear has started to become a route for supporting this.

34 What challenges will providers face if they want to bring in more industry expertise?

Please provide your answer below:

We believe that the government should actively encourage the use of experienced people from industry in the delivery of T levels. Colleges and training providers often have difficulty in attracting them as tutors, due to salary differences, so we believe the government should provide bursaries to facilitate this.

Training to become a T level tutor should be fully government-funded.

There may also be opportunities to use expertise from industry on a guest lecturer or secondment basis, but there would need to be funding for industry for this to be universally available and sustainable.

The secondment of provider tutors into industry would increase their knowledge of the application and relevance of the core technical components in industry, but this is another challenge for employers as it is someone else to induct and train. There may be some employers who could accommodate this, but it would need to be funded as part of a recognised scheme to be effective and consistent.

35 Should we seek to further influence which T levels are offered by providers, according to local and national skills needs?

Yes

If yes, how should we do this?:

If this is not done some areas may have limited STEM options due to lack of provision – as is the case today. Providers need to work with their local LEP and relevant skills panels to understand the local priorities and employment opportunities. Providers need to be incentivised to offer STEM T levels; this can be achieved through dedicated funding for STEM.

36 How do providers currently take account of local and national skills needs when planning their provision and how do they work with the existing structures that have responsibility for local skills planning?

Please provide your answer below:

37 What additional support will providers need to ensure that T levels meet local skills priorities?

Please provide your answer below:

Providers need support to work more closely with local employers and listen to their requirements. LEPs should be encouraged to work together to develop regional solutions to STEM skills for the training to be cost effective. This means centres of excellence properly equipped to deliver practical science and technology, and ideally with the facility to accommodate block release training.

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 :

Completion of the work placement should form part of the accountability system along with a satisfactory employer Reference.

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:

There are potential impacts of placing T level learners in the workplace similar to those that exist for other industry employees who may have special needs and protected characteristics. Overall, the measures provided in the 2016 apprentice assessment of equalities impact report demonstrate mainly positive outcome for learners placed in organisations.

However, careful consideration must be given to placements to the physical environments and operational situations, including operating and manufacturing processes in high hazard operations, some may require the wearing of protective clothing or equipment or able to respond safely to emergency situations.

Employers will have to consider potential increased supervision and support and recognise potential additional costs