

Middlesex University response to Government consultation on the Implementation of T level programmes, February 2018

- 1. 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/No If no what other principles should we consider?**

No.

Principle 3 on “progression to good outcomes” needs a clearer definition which focuses on what a good outcome looks like. This could mean moving into paid work or progression to higher level academic or technical learning. Many level 3 qualifications play a particularly important role in supporting progression to higher level learning.

When considering the role of Applied General Qualifications (AGQs), it will be important to recognise the “distinct purpose” of these qualifications. For example, BTEC Nationals provide an important and established progression pathway to higher education. Over 100,000 students a year progress with a BTEC either on its own or in combination with A levels. UCAS data shows that for the 2017 application cycle only 61% of 18 year old applicants held only A level qualifications with 11% of remaining applicants holding BTECs only and 8% a combination of BTECs and A levels. As a higher proportion of students opting for BTECs come from disadvantaged backgrounds they also play a critical role in supporting social mobility, providing a pathway for disadvantaged students to progress through to higher level learning, either on an academic programme or a higher or degree apprenticeship.

Applied Generals also play a particularly important role in key subject areas. In 2017, 9 subjects account for 80% of all BTEC National students (Sport Studies, Business, Health and Social Care, ICT, Applied Science, Art and Design, Engineering, Creative Media and Public Services). In many subjects they are well established as alternatives to A levels, often preferred by higher education institutions.

The Applied Generals have recently been revised to meet DfE criteria to support better progression into higher education with the main cohort of students progressing with revised qualifications moving into higher education in summer 2018. It would be premature to withdraw these programmes before we are able to see the impact of those changes. We would urge Government to allow recent reforms to embed before considering further change.

Middlesex University supports Government’s efforts to reform technical education and raise parity of esteem with academic routes. We recognise the need to simplify the complicated technical education system however it will be important to ensure reforms remain focused on the needs of the learner. These needs are often by nature complex and varied with different needs at different times throughout the learner’s life. This will mean that a system of education genuinely designed to meet the learner’s needs will not fit into neat categories and structures or

necessarily be simple. The tendency to separate academic and technical education routes into two simplistic alternatives does not adequately reflect the learner journey which often moves between academic and technical routes at different times in a learner's life. Permeability and flexibility between types of learning in our education system is vital if we are to enable progression through both A and T levels to higher level learning and achieve the goals in the Government's industrial strategy, namely to increase social mobility and productivity.

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

No

The proposed assessment system includes variable grades for the Core and Occupational Specialism elements of the T level programme. This will make it difficult for universities to understand and interpret a student's results. It is also unclear how credit and assessment will be applied to the work placement element of T levels when tasks allocated are like to be highly variable.

Close communication and engagement with university admissions services will be vital to ensure recruitment into higher education from T levels. It will also be important that all components of T level programmes are allocated UCAS tariff points to support the recruitment process for T level students into higher level technical education and support university data reporting to Government. Universities will need to adapt and tailor their admissions services to accommodate T level learners so it is important there is timely engagement with the sector to support this process.

6. 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.

Yes.

Flexibility to transfer between T levels with recognition of prior attainment of the core is vital. T level learners will primarily be young people whose identities, expectations and careers plans are evolving. For this reason it is essential they are able to move between T levels without unnecessary barriers. Mobility across T level routes should also be considered, as well as arrangements for students to move between T and A levels. Young people need the possibility to adjust and change their career paths. This is particularly the case for disadvantaged students who are often less well supported and have additional responsibilities and commitments which may cause them to alter their journeys.

7. Do you agree with the proposed approach integrating the work placement within the T level programme? Yes/No - Please explain your answer.

Yes.

The high quality, substantial work placement element of T levels has the potential to support pathways to work and higher level learning. Middlesex University is a pioneer in practice based learning. Through our own close links with employers and developing practice based provision in

higher and degree apprenticeships, as well as technical academic programmes, we know the interaction of learning from work placements and more traditional forms of study enhances the learning experience greatly and ensures that learners have the skills employers need in the work place.

As acknowledged in the consultation document, placements may be challenging to secure for all students, particularly in more remote areas of the country. In principle, Middlesex University could offer work placements to T level students. However, the University would have limited capacity to roll out T level work placements out in scale. Careful consideration of the practicalities of how to place young students within University facilities, for example laboratories, or professional services is needed. One mechanism to incentivise university engagement in delivering T level work placements could be to enable them to access apprenticeship levy funds to support this process.

8. Do you agree with the proposed method of appraising the student's performance on their work placement, including the Employer Reference? Yes/No - Please explain your answer.

No. As noted in our response to question 3 above, given the likely variability of content across placements it is unclear how work placements will be assessed. Clarity is also needed on whether the placements would be credit or tariff bearing, both of which would support progression into higher level learning and mobility between T level routes or other level 3 qualifications. There may also be some value in incorporating a written reflective piece from the student in the assessment mechanisms.

9. Do you agree with the proposed approach to quality assurance set out above? Yes/No - Please explain. If no, please explain how we can ensure work placements are quality assured.

Yes. Careful consideration should be given to the role of OfSted in inspecting and evaluating the work placement element of T levels which is a new function for a body focussed on inspecting school and college provision. It will be important to keep quality assurance processes simple and avoid unnecessary bureaucratic burden for employers if they are to be incentivised to engage with the T level agenda.

10. 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?

Flexibility by the employer to support those with greater needs or special circumstances will be important. For example, there would need to be different expectations of outcomes for these types of learners and flexible working arrangements to take into account their particular needs. Providers and employers would need to work together to ensure appropriate arrangements could be put in place.

11. 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?

The Skills Advisory Panels network could play a role in addressing this challenge. It will be important to consider skills needs at national level and ensure there are mechanisms to provide appropriate placement opportunities across the country.

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

Transport costs are often a challenge for students, particularly commuter students, and it will be important to provide incentives for employers to support these costs and/or to ensure that providers have sufficient means to “pay for or contribute to” these costs.

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

For the work placement element to work effectively it will be important to consider the incentives for employers to deliver work placements. Responsible employers should of course play their role in upskilling the next generation through investment in future skills development and there are potential benefits for employers of engaging in the delivery of T levels from faster and cheaper recruitment further down the line. However, in this challenging financial climate, many businesses will struggle to find the resource to support and administer work placements, particularly SMEs.

The experience of the apprenticeship levy should inform work with employers to engage them in T level work placements where employers have struggled to use levy funds and often lack understanding of how the levy works. Clear and simple information for employers will be vital.

14. How do these challenges vary across industries and location types?

In many sectors industries are dominated by SMEs, for example the creative industries, and finding placements may be a particular challenge.

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

See answer to question 13 above.

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

There is long term commercial and reputational gain for employers who are seen to contribute to the domestic economy by developing skills for the future. The 5% Club is an interesting model which has had some success in promoting employer investment (particularly in the construction and defence sector) towards achieving 5% of their workforce in apprenticeships or work based learning. The 5% Club badge is gaining recognition as a kite mark of good business practice in skills development and The Club networks likeminded employers engaged in tackling the skills shortage. Such a kite mark could have a similar role for T levels as a mark of prestige and responsible engagement in skills creation.

17. 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?

It would be beneficial to enable students to take a higher level maths qualification. This may support recruitment from T levels by universities for some courses where there are often concerns about the level of maths knowledge of students holding non-academic qualifications. Allowing T level students to pursue a higher level maths qualification could support progression into higher education where there are more stringent admissions requirements for maths.

Middlesex University is not in a position to comment on the implications of this for T level providers.

18. Which of these options for funding maths and English within the T level programme do you think would be the most appropriate? Please explain the reasons for your answer.

Middlesex University is not best placed to comment on the funding options for these elements.

The inclusion of functional maths and English in the T level design is welcome and has the potential to improve skills in an area where many students struggle. However, it will be important to ensure the provision for functional skills adds genuine value through a distinct, tailored approach for the T level context. Ensuring functional maths and English skills is a long standing problem which many methods have failed to tackle effectively. It will be important to identify an approach to delivering skills that is adapted to the specific needs of T level learners.

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

Reflection is needed on the relationship and synergies between T levels and apprenticeships. It will be important that T levels support learners in developing their full potential and support progression to higher and degree apprenticeships. In developing T levels the IfA must ensure T level pathways are closely aligned to apprenticeship pathways at higher levels.

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

Middlesex University is supportive of Government's efforts to raise the quality and provide parity of esteem for technical education. We believe T levels have potential to strengthen pathways to work and higher level learning and support the industrial strategy goals of boosting social mobility and productivity. Higher education plays an integral part in delivering high quality high level technical education and it is important this is recognised in the development of both apprenticeships and T levels. Middlesex University is a University for Skills and a pioneer in delivering work based learning and higher and degree apprenticeships. We are deeply engaged in delivering apprenticeships in Construction Management (levels 5 and 6), Chartered Management (level 6), Business to Business Sales Professional (level 6) and Academic Professional (level 7). In 2018 we are launching the following public sector degree apprenticeship programmes: Police Constable (level 6); Social Worker (level 6); Registered Nurse

(level 6); Teacher (level 6), as well as the following degree apprenticeships: Senior Leader (level 7); Digital Technology Solutions Professional (level 6).

The bifurcation of education into academic and technical routes does not reflect the varied pathways that learners take throughout their lives and the role that many universities play in delivering technical education. The IfA plays a critical role in approving standards and overseeing both apprenticeships, including degree apprenticeships, and T levels. This gives the IfA an important function in supporting access to higher level technical education. It is therefore critical that there is strong representation and understanding of higher education within the IfA. Universities have experienced delays to the approval of apprenticeship programmes caused by IfA misunderstanding of higher education sector quality assurance arrangements and the role of many universities in delivering practice based technical education. This is holding back development of higher level technical routes and creating barriers to the industrial strategy goals of boosting social mobility and productivity through higher level learning. If progression from T levels through to higher level learning is to be assured it will be important technical and higher education agencies and decision makers collaborate effectively to support solid progression routes and permeability between technical and academic pathways.

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

As indicated in our response to question 5 above, universities have direct experience of recruiting students from a diverse range of qualification backgrounds to access and succeed in higher education. It will be important to engage with higher education admissions professionals on T levels. This will help ensure universities develop an understanding of T levels and are able to communicate entry requirements to prospective students and level 3 providers. It will also assist universities in meeting the specific needs of students progressing from these qualifications into higher education. Information around access to higher education from T levels should also be communicated to students further down the line who are making choices about level 3 study in schools and considering pathways and routes from T levels. Universities can also play a positive role in helping to shape the content of T levels, particularly the Core module.

28. 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?

As recognised in the Government's Careers Strategy, high quality careers information advice and guidance for students and parents will be essential to ensure the successful implementation of T levels. There should be clear signposting within the curriculum to create awareness of the T level option and ensure that young people avoid shutting down options, for example by choosing academic subjects that will not feed into T level study. This is particularly important as the choices made about post-16 study will narrow further study and career options. Students of this age are still forming their identities and expectations of life so it is vital that early information is provided. Particularly important will be data on the labour market demand for the occupations supported by T levels, as well as information about progression to higher level learning including universities admission requirements.

Middlesex University is playing a key role in its local area in raising aspiration and attainment through its outreach with local schools and FE colleges through its innovative programme Make Your Mark¹. Make Your Mark promotes progression pathways through school, college and higher level learning with a focus on technical routes such as apprenticeships, community events and a dynamic microsite.

32. 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?

Middlesex uses a range of methods to take account of local and national skills needs when planning provision. This activity ranges from the inclusion of employers in curriculum design, business liaison through our Employability Service and partnerships with business to develop programmes. We also work closely with representative industry bodies to share intelligence on national skills issues as well as with government on issues related to workforce planning in the public sector, such as in the supply of teaching and healthcare professionals. Middlesex is also engaged with the West London Alliance, a partnership between local boroughs, business and skills providers to understand future regional skills needs and match skills provision to those needs.

¹ <https://makeyourmark.mdx.ac.uk/>