

# Response ID ANON-YRQW-NZWH-T

Submitted to **Implementation of T level programmes**

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## Introduction

### 1 What is your name?

**Name:**

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**Email:**

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### 3 What is your organisation?

**Organisation:**

Energy and Utility Skills

### 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? :**

### 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 technical qualification

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

Yes

**Please give reasons for your response.:**

Employers agree with the proposed approach to assessing T Levels, but encourage the DfE to ensure:

1. External moderation is included to maintain the impartiality of the assessment.
2. Assessments in Routes and Cluster occupations are valid and comparable over time, and between modes of assessment and geographic spread.
3. The agreed approach to assessment is pilot tested before full roll-out. This will ensure that the introduction is at a sustainable pace for all stakeholders and the final assessment approach has been robustly and rigorously tested.

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

No

**Please give reasons for your response.:**

Due to the different components that make up the T Level qualification it is understandable why the proposed grading model has been suggested. However, the employers from the energy and utilities sector expressed mixed and negative views on this. Their main concerns are:

1. Having the core component graded E-A\* and specialist component graded as Pass, Merit and Distinction is confusing for all users and recruiters, whether that be employers or HE Providers. The grading must be simple and easy for all to understand and make a judgement on the potential candidate's ability and performance.

2. Also, it is difficult to determine how these grades inter-relate with other qualification grades, making it difficult to determine how they could lead to additional education or progression opportunities.

A suggestion (from employers) is to have a grading structure, similar to the higher education first degree model, where core and optional models are awarded a percentage mark and these make up an overall grade of first, 2.1, 2.2 etc. The work placement may be equivalent to a module and awarded accordingly and each component of the T Level could be weighted to reflect the core and optional elements of the qualification.

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

Yes

**Please give reasons for your response. :**

We agree with this proposal to ensure comparable standards among different training providers and over time, for the same title of T Level qualification. However, we would also propose that measures are put in place to ensure comparability of standards between different modes of assessment and between alternative components within the same T Level syllabus.

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

No

**Please give reasons for your response. :**

There is the potential to count, in principle, prior attainment of the core if a student switches to another T Level within the same route as long as a clear rationale for equivalence has been set and established.

**Work placements**

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

No

**If no, what would be a preferable approach?:**

Employers in the sector expressed the view that until the T level cluster curriculum/syllabus is available, it is difficult to establish whether a meaningful work placement would be possible. For example, apprentices tend to complete a 3-4 year programme and it is only after this time that they can work unsupervised. To make this work, our suggestion is to formalise the structure and establish a universal framework for the work placements and acknowledge where these may or may not be feasible on the grounds of safety.

In principle, integrating the work placement within the T Level programme is useful to illustrate the wide range of engineering occupations that historically have been overlooked by recruiters, and as a sector, we are keen to offer support to the DfE to ensure it is both safe, feasible and practical for the Engineering and Manufacturing Route.

**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?:**

The main issue here is achieving parity and fairness for the students in assessment among and across industries and sectors. Therefore, along with the standard template, a common process and guidance should be developed for employers and users to support drafting of the student's appraisal.

It will also be important for the limitations on any legal liability for the employer to be made clear within the template and supporting guidance. There should be provision within the template for the employer (or supervisor) to make clear where they do not feel able to endorse the student's competence in a given area or where there simply has not been the opportunity to carry out sufficient observation. The template should also ensure that the provision of the Reference is not simply a formality, but that employers and providers can distinguish easily between those students who have genuinely excelled on the work placement and those requiring further support.

Our employer Apprenticeship and Technical Education Advisory Group would welcome the opportunity to assist with development of the method and the Employer Reference pro-forma for appraising a student's performance on their work placement and testing of the appraisal method.

**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?:**

In addition, we recommend providers should also check students' eligibility for specific work placements, which may include checking the student's age, Disclosure and Barring Service (DBS) status and drugs/crime history.

Overall, the proposed approach is feasible. However, before it is rolled-out, the quality assurance process ought to be tested in the DfE's Work Placement Pilot Scheme which was launched in September 2017. One of the key elements to explore is whether the various stakeholders, including providers, employers and Ofsted, have the capacity, expertise and resources to manage and deliver the process.

For work placements, Ofsted will consider the inspection of work placements within the overall inspection of T levels. However, a number of questions remain: will the inspectors be recruited from and understand the industry? Will Ofsted be granted additional funding for this inspection? Indeed, the current remit to inspect apprenticeship training providers is already proving to be challenging. We urge the Government to consider these issues before implementation.

#### **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:**

Our consulted employers' recommendations for T Levels are:

- To fit T Levels around domestic responsibilities and commitments, we suggest flexible accessibility and learning. This could include a modular programme using a combined mode of learning e.g. classroom and online learning.
- In addition, making provisions to enable flexible work placements.
- Part-time learning options with T Level career loans, such as the Personal Career Accounts proposed by the Learning and Work Institute, to enable adult learners to complete their studies, knowing that financially they are supported and can afford to take the time out to upskill.

The lack of digital skills can impact adult learner's motivation and confidence to learn, therefore, we suggest that a tailored digital course for adult learners is adopted.

#### **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 :**

The Government should have a leading role and take responsibility for managing the network of work placements. This should be undertaken by introducing a central and national system to ensure the process is 'joined-up', of a high quality and that all placements opportunities are accessible to the providers and students can make an informed choice. The system should also include careers and options guidance, advice from careers experts and information on occupations. The key feature of the system must be to ensure parity in work placement experience and outcomes.

In addition, employers recommend that government introduces resources and funds to allow students to attend residential work placements and/or reasonable financial support for travel or subsistence costs. This initiative should be introduced in sectors with critical technical skills shortages, such as energy and utilities industries. Our consulted employers would be keen to pilot a trial in the energy and utilities industry, where we serve 65 million consumers each and every day and power the economy.

#### **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:**

Our consultation with employers from the energy and utilities sector found employers to be supportive of the notion of a work placement component, but questioned how practical this element would be within certain clusters in the Engineering and Manufacturing Route. The draft occupational mapping of the route is currently restrictive and fails to mirror the needs of the UK's utility infrastructure businesses. The employers identified the following main barriers and challenges:

There are significant safety considerations for a highly regulated sector which may limit the work placement. For example, some employers are required to meet HSE standard therefore, have no 'real' on site work placements, whether at level 2/3 or even degree level.

Sector employers have shown throughout the adaption to the Apprenticeship Levy and Trailblazers that they are willing to be in the vanguard of change and are prepared to embrace change; however, they have responsibilities to the Energy and Utilities Regulators, as well as shareholders. Some employers have an age restriction of over 18 years, not to create bureaucratic barriers but for well-established safety and regulatory reasons. Safeguarding must consider the nature and location of the placement: it would be both a challenge and cost to ensure that the range of people the young person would come into contact with would have the required DBS check. A solution recommended by employers might be to allow employers to offset some of these high pastoral costs by offering a financial incentive to cover these costs. This could be achieved by enabling employers to draw down against their unspent levy.

It is also vital to consider what is both practicable and achievable in the three month work placement, as much of the placement in some industries may be confined to induction activities - for example, working at heights, safety, confined spaces, company policies and procedures etc. Furthermore, the candidate may not have adequate opportunity or time to assimilate knowledge and practical skills experience to achieve a meaningful set of competencies to work in the selected occupation area.

Some employers outlined that they may not have the capacity or capability, such as the structures in place, to offer the sheer volume and range of placements, or enough trained staff to offer and deliver work placements, or resources such as start-up costs and management costs. A solution may be to offer employers some financial support for development costs.

Finally, it is also important to consider the broader picture and implications for post T level employment within a highly regulated and safety critical sector. Occupational maps provide a roadmap; an organising framework, but it is important not to confuse the academic level with an occupational competence level when using these to design the T level curriculum. For example, a T level in mechanical or electrical, control and instrumentation at level 3 would not mean (even with a 90 day placement) that an individual could progress directly into a skilled occupation without further skills training – indeed it would be more likely that initial skills training might need to be at a lower level e.g. basic hand tool skills. Equally, they could not expect to progress to a level 4 professional role without time

served and experience gained. If employers faced with recruitment decisions between an apprentice and a T level graduate are expected to pay for post T level upskilling, this could potentially impact upon recruitment decisions. Therefore, in the initial post T level period, which could be time-bound, we propose that employers should be able to utilise their levy to offset this cost to create a level playing field for all young people, whichever technical route they choose.

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

**Please provide your answer below :**

Please see response to question 17.

### **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:**

Please see response to question 17.

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

**Please provide your answer below:**

In terms of whether employers would value such a recognition, further details are needed to make an informed judgement on this. In principle, yes, as long as it is awarded on merit, based on quality and not quantity of work placements. This will ensure that both providers and students can make an informed choice on their work placement employer. Our employer Apprenticeship and Technical Education Advisory Group would welcome the opportunity for further discussion around the potential options for recognising employers who deliver high quality work placements for T Level programmes.

## **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 :**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

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

Option 2

**Please explain the reasons for your answer. :**

The preferred and workable option is 2. This would allow students to meet the demand of the T Level curriculum without losing 180 hours of learning to Maths and English, while others receive the whole 930 hours for T Levels. Option 1 is not only unfair and disadvantages the learner, it also creates difficulty for providers in terms of a curriculum management perspective and qualification delivery.

## **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?**

No

**If not, why not?:**

We appreciate that innovation is, by nature, an iterative process. Therefore, as a sector, we are keen to offer support to the DfE to ensure that the curriculum and any additional occupation-specific requirements that can be delivered and assessed off-the-job are confirmed as fit for purpose within a broad engineering sector, as the T levels evolve. At this point in time, it is difficult to recommend specific requirements as the curriculum content and T level qualification specification are not yet defined, even at a high level. However, we would be willing to participate in further consultation when this is in draft. Our initial suggestions are to include any professional registration and Level 3 learning requirements.

## **Certification**

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

No

**Please explain your answer. :**

We conceptually agree with the information proposed by the Government for inclusion in the certificate; our concerns are with the grading structure as outlined in our response to question 4. If these concerns are managed, the proposal would work. Finally, the apprenticeship has an overall grade and we would like to see something similar for T Levels. This will aid users with comparability and transferability, using the qualification in the employment marketplace.

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

Yes

**Please give reasons for your response. :**

## 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:**

Our consultation with employers found that there is a positivity towards the creation of T levels, and it is believed they will help in attracting and recruiting new talent into the vital energy and utilities industry. Employers therefore see it as essential that the design and progression is fit for purpose from the start, and would wish to offer their counsel and support in ensuring that robustness. We have two suggestions for the design and content of T Levels to enable progression onto apprenticeships. They are:

- Alignment of core content for Technical Education apprenticeship and T level routes, by ensuring the T Level programmes' and Apprenticeship standards' core content at Level 3 is equivalent.
- Making it clear what top-up is required to move onto an apprenticeship at higher level or which components of the apprenticeship are exempt, except as a result of achieving the T level at the same or higher level.
- The proposal for large occupational specialisms is welcomed and would apply to the energy and utilities sector. If employers faced with recruitment decisions between an apprentice and a T level graduate are expected to pay for post T level upskilling, this could potentially impact upon recruitment decisions. Employers have suggested that, for the Engineering and Manufacturing occupation route, the Government considers revising the funding rules, allowing employers to fund the same level apprenticeship – but only when it is a transfer from a T Level. This will encourage employers to take on T Level students for an apprenticeship and will prevent both employers and students from feeling like they are disadvantaged by this progression route.

### 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:**

In addition to the suggestions under question 22, we would recommend alignment of programmes at development point, making progression routes and requirements for progression into the T Level specification clear. Higher Education Institutes must therefore be involved to determine this, attribute UCAS points for courses for applicants and design T Levels at higher levels.

### 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 :**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

## 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:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

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

**Please provide your answer below :**

In addition to building on the existing work outlined in the T Levels implementation consultation, the focus should be on developing flexible and accessible ways of delivering provision for adults and reducing course costs. Other employer recommendations for T Levels are:

- To fit T Levels around domestic responsibilities and commitments, we suggest flexible accessibility and learning. This could include a modular programme using a combined mode of learning e.g. classroom and online learning.
- In addition, provision should be made to enable flexible work placements.
- Part-time learning options with T Level career loans, such as the Personal Career Accounts proposed by the Learning and Work Institute, could enable adult learners to complete their studies, knowing that financially they are supported and can afford to take the time out to upskill.
- The lack of digital skills can impact adult learners' motivation and confidence to learn. Therefore, we suggest that a tailored digital course for adult learners is adopted.

## 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:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

**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 :**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

**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:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

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

**Please provide your answer below:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

**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?:**

T Levels should be driven by a strategic UK skills and workforce development plan, ensuring the resilience and sustainability of workforces in critical industries are tailored to local economic needs. This is especially important in a post-Brexit Britain where skills gaps are already widely predicted to occur and could negatively impact GDP. We therefore recommend that priorities should be set and aligned with critical skills challenges in sectors vital to UK productivity and growth, thus being demand led.

For instance, the energy and utilities sector, which provides the UK's power, water, heat, light and waste removal and treatment, faces critical skills and workforce renewal challenges; it is predicted that 221,000 vacancies will need to be filled during the next decade, brought about through 100,000 existing employees that are set to retire and 90,000 people who will leave to find new roles . These challenges are made all the more daunting by the difficulties the sector faces in filling vacancies with competent workers. The Employer Skills Survey (2015) found that the proportion of vacancies that are hard to fill in the energy and utilities sectors due to a lack of skilled applicants is 36%, which is higher than any other sector (average UK figure is 23%) .

While we do acknowledge clear regional differences in workforce deployment needs, sectorial focus is vital to create a stable and efficient business environment for these energy and utility companies and their supply chain.

**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:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

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

**Please provide your answer below:**

Our consultation response primarily, concentrates on the areas that were identified by energy and utilities employers as most crucial for them in the implementation of T Levels in the sector.

## **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 :**

**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 :**

**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 :**

**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:

## **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 :**

All four measures are valid and necessary for accountability purposes, together with the right measurement metrics they will allow Government to determine performance of T Levels in practice. It may be beneficial to have an additional measure or sub measure which is employer focused. This measure would track and focus on how the skills needs of employers and industries, in particular the technical skills shortages the economy requires, are being met by Technical Education Reforms.

For students our suggestion is to conduct a national T Level survey – incentivised and issued at the start / mid-point and ahead of final certification. It could also be beneficial to give students the opportunity to submit anonymised feedback via an online tool or an App so that they can provide instant and timely feedback on their training, employer and experience.

The experience of employers should also be evaluated via an annual survey or by piggy-backing on an existing survey, such as the DfE Employer Perspective Survey, to understand how well T Levels work for employers, to gain their views on recruiting T Level students onto a technical role or taking on T Level students onto an apprenticeship programme, and whether the programme has had the desired impact, and to understand any unintended consequences.

## **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:**

Please see response to question 10.