

Response from the Royal Society of Biology to the Department for Education's consultation on 'Implementation of T level programmes'

8 February 2018

Principles of the T level programme and wider qualifications

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 do you think we should consider?

The Society agrees with the principles of the Sainsbury Report on which these T level developments are based, and acknowledges there is too much complexity in the current system of technical qualifications. Simplifying the system will make choices more obvious to learners and parents. T levels should be developed as qualifications which have comparative currency as A levels, and should allow students to transition between the two routes as appropriate.

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?

Appropriate guidance should be provided at the school level, as to which qualification is most suitable at 16, and what options for further study are. This guidance should be provided for post-16 qualifications only, as we support a single route through the sciences for all students up to the age of 16. All qualifications available to students should have a clear progression route.

The components of the T level programme

The technical qualification

3. **Do you agree with the proposed approach to assessing technical qualifications?**

Yes/No

Please give reasons for your response.

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The assessment approach must include examined and practical components and should be developed with input from experts within relevant fields. The Society is pleased that each T level panel has an associated education advisor who has expertise in curriculum development and assessment. This is very important as employers are not assessment experts and shouldn't be expected to develop assessment plans.

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

Yes/No

Please give reasons for your response.

The proposal is consistent with the current A level grades A* - E, however should A levels move in line with new GCSE 9 to 1 grading then T-levels must also be presented in this grading system. The DfE should also consider whether it is necessary to have such a variety of grading within the T level itself, A* - E, pass/merit/distinction, GCSE English grade 9 - 1 and complete/incomplete, which may generate confusion for employers.

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

Yes/No

Please give reasons for your response.

Maintaining comparable standards of performance should be the role of the Institute for Apprenticeships and Technical Education. Trailblazer standards should be brought in line with new T levels to ensure consistency. More detail is required on the role of employers in standardising occupational specialisms. Where a skill is not normally assessed by employers, guidance or a framework produced by assessment experts will be required.

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.

Within a route students should be able to switch to another T level as they will have completed the same core content, this will support progression for students and allow them to keep their options open. The core content between routes will be significantly different, and in that instance it would be reasonable to expect the student to start at the beginning of the new route.

Work placements

7. Do you agree with the proposed approach integrating the work placement within the T level programme?

Yes/No

If no, what would be a preferable approach?

The RSB agrees that all work placements should be meaningful and ensure that students develop technical abilities and master essential skills required to work in their chosen field. Some degree of flexibility will be required to suit the needs of the industry as well as provider. For example, employers have raised concerns that 45 – 60 days over 2 years may not be sufficient for some routes. T level panels should set parameters to

allow for flexibility, and should include guidance on how work placements should be timetabled as part of the individual T level i.e. whether it is more appropriate to build the skills 2 days per week or blocks of 4 – 5 days.

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

Yes/No

If no, what would be a preferable approach?

Where possible, T level learning objectives should be linked to profession registration competencies, to enable students to work towards professional registration. It is reasonable to suggest that employers will be required to provide an appraisal of the student's performance on the placement. However, it is unclear if students will be assessed against the employer's standard appraisal process for their individual learning objectives. For some employers, this may not be easy to adopt, and an assessment or appraisal framework may be required to aid employers and ensure consistency in student assessment.

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

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?

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 Institute for Apprenticeships and Technical Education could support students by establishing a central online register of employers and available work placements would allow students to identify organisations that could assist in their region, if not locally.

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

Yes/No

Students who are unable to find a placement in their local area should be supported financially by their employer or provider to cover additional travel expenses. Competition for placements may be increased where some employers in a given route pay students while other employers pay only expenses. More guidance on appropriate remuneration for students is required.

To ensure parity of esteem between A levels and T levels, students should not be limited by the cost associated with different courses when choosing which T level pathway to follow or whether they should follow an academic or technical route. The government should take steps to ensure that travel and subsistence costs do not act as barriers to students choosing T levels, and do not solely determine the course the student chooses.

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

While some industries regularly host short week long work placements and longer summer placements for undergraduates, others will be more familiar with a more traditional apprenticeship approach. There may be competition for work placements from students studying similar technical qualifications, for example those undertaking apprenticeships. Competition for placements should be considered and managed. Although

students will be working at a different level employers that already take on undergraduates as summer placements may not have capacity for additional places.

Work placements may be limited within bioscience organisations that lack the capacity to facilitate suitable work placements. Organisations that lack the resources to effectively supervise students or provide training with appropriate equipment may only be able to take on small numbers of students at a time, or require longer induction into work placements to ensure students are appropriately health and safety trained and have completed a disclosure and barring service check before beginning their placement.

Employers often feel they are getting little out of work placements, as they are rarely compensated and feel pressure from shareholders and management to meet deadlines and achieve results. Inexperienced students can be seen as a hindrance to this - buy in from a levels of staff will be required to make T level placements a success, and it is likely staff involved in supervising students will require additional training.

There will be additional costs to employers taking on new work placements and in training staff, however financial incentives are unlikely to be large enough to encourage others to take on students.

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

For bioscience industries, and STEM more generally, the presence of under 18s in laboratories may cause issues. Health and safety training will be required and in some cases employers may be required to inform their insurance provider. There will be industry mandated limits on activities under 18s are allowed to complete, and as a result it may be that students can only observe some activities.

The resources and availability of equipment vary between colleges. On a regional level, this disparity between colleges may lead to some colleges becoming specialists in certain discipline areas. This has the potential to limit accessibility of courses for students within particular geographical areas. The Institute for Apprenticeships and Technical Education should review geographical coverage and ensure all students have the opportunity to access all T level routes. In some cases this may require financial support for students to travel, or additional funding for colleges to maintain and update equipment and facilities.

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

Training to increase understanding of issues and appropriate adjustments for students with additional needs may be required, as these will not always be the same as adjustments made for adult workers with disability or other needs.

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

There is a risk that new 'kitemarking' schemes may not be recognised or understood by employers. A common kitemarking standard that is self-regulating and builds on existing processes is likely to be more effective.

Maths, English and digital qualifications

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?

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

Additional requirements/qualifications

19. 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/No

If not, why not?

The qualification should ensure students are ready for whatever occupation they are entering so ensuring the specific requirements are met is important. However it is expected that students be competent but not necessarily work ready in all areas. In the absence of licenses to practice, employers should encourage students to work towards professionally registered with the relevant professional body in their chosen profession. To ensure that they continue to demonstrate their professional competence throughout their career, through engaging with continued professional development (CPD). There will be some basic data handling, laboratory skills and health and safety precautions common across all T levels within a route, T level panels should consider whether these should form part of the core or additional requirements.

Certification

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

Yes/No

Please explain your answer

A single, nationally recognised certificate for T levels would simplify the current system and enable better comparison across qualifications. T level certification should be recognised internationally as high quality qualifications, as A levels are currently. However, greater clarity is needed around inclusion of the learning objectives on T level certificates. If the learning objectives are to be the same within each provider, they must be agreed at a panel level.

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

Yes/No

Please give reasons for your response.

There must be the opportunity to progress to other routes, including to bioscience careers, further education, higher education, A levels or returning to their T level. Partial attainment will support students who have not completed the qualification to switch between qualifications. More detail should be provided for occupational specialisms and work placements, including which learning objectives have been met and the number of hours of work placement completed.

Flexibility and progression in technical education

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

As described in the consultation document, aligning the content and requiring part completion for gaps seems like a reasonable approach. However, this may be difficult to implement formally without discrimination. This could be alleviated by ensuring all T level training provides the appropriate footing for apprenticeship training, as well as other types of training.

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

More dialogue is needed with higher education providers, to ensure appropriate underpinning for further study is included. Employer representatives on T level panels should not be expected to anticipate the needs of further and higher education. A focus on maths and communication skills is appropriate for T levels, but core subject knowledge must be stressed for progression to further study, and students must be prepared for critical thinking as well as practical skills to aid this. For example, students could be asked to generate, analyse and critique data.

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

There must be parity between academic and technical routes to allow progression to degree courses. To succeed on degree courses, learners with a technical background would benefit from a foundation year to fill any gaps in biology subject knowledge and the relevant practical skills associated. Admissions tutors will assess this on a case by case entry. Some opportunities for students to sit unseen examinations as part of the T level would be beneficial, as higher education providers often find students perform poorly, and sometimes do not recover, if they have not sat exams for a number of years.

Meeting the needs of all learners

25. 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?

A transition year is important to help avoid limiting student choice/options at an early age. After development of T level routes, transition qualifications will need to be developed. This provision should draw on lessons learned from current foundation programmes that allow students with a variety of qualifications to enter undergraduate degrees.

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

The needs of career changers will need to be considered. Such individuals are unlikely to be able to undertake an unpaid work placement. Adult learners completing a T level could be expected to focus more heavily on working towards registered status. Further education colleges should be consulted, as they are expert in adult learning.

Delivery of T levels

- 27. 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**

For providers delivering the new T levels, we envision the following challenges will arise:

- Existing staff within the provider will likely be required to undertake Continuing Professional Development (CPD) to ensure individuals are appropriately trained to facilitate T level teaching and placements.
 - Further Education colleges may need additional financial support and teaching staff to work in partnership to deliver qualifications.
 - Providers offering laboratory-based T level courses will require facilities to teach these laboratory skills, which can incur high costs.
 - Timelines will need to be designed to align work placements and classroom based courses.
- 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?**
- 29. How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching and training other members of staff?**
- 30. What challenges will providers face if they want to bring in more industry expertise?**
- 31. Should we seek to further influence which T levels are offered by providers, according to local and national skills needs?**
- 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?**
- 33. What additional support will providers need to ensure that T levels meet local skills priorities?**

Procurement and contracting of qualifications

- 34. 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?**
- 35. 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?**
- 36. 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?**

- 37. 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?**

Accountability

- 38. 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/No

Please explain

More detail and consultation is required regarding accountability. The destination data will look very different for different routes, and will need to take into account that some students will choose to go on to further study or apprenticeships. If this metric is used the timeframe should also be carefully considered. Completion measures could be problematic due to the mixed qualification format and interaction between work placement employer and provider.

Funding

- 39. Do you have any comments about how we might approach the funding of T levels? How could the funding formula be adapted to distribute funding for T levels?**
- 40. How might we adapt funding flows to awarding organisation, to make sure that the full range of T levels is available to students around the country?**

Equalities

- 41. 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?**