

SENT BY EMAIL

14 February 2018

The Rt. Hon. Anne Milton MP
Minister of State for Apprenticeships and Skills
Department for Education
Great Smith Street
Westminster SW1P 3BT

Dear Minister

RE: T-Levels Response Outline

Introduction

We welcome the opportunity to comment on the Government's proposal for T-Levels for 16-19-year olds in England. The Federation of Awarding Bodies (FAB) represents the Technical and Professional Education awarding organisations in the UK; our members offer the majority of all vocational and technical qualifications taken in England. FAB has separately submitted a full response to your T-Level consultation, as of course our individual awarding body members have done.

We were pleased to see you continuing as Apprenticeships and Skills Minister. We believe, as I'm sure you do, that it is important to have continuity of policy thinking at a time of such fundamental reforms to technical education policy.

Argument

We applaud the Government's ambition and commitment to raising the status of technical education, through the ongoing apprenticeships reforms, moves to develop T-Level programmes of study at Level 3, and the Department's review of Level 4 and 5 technical qualifications. These reforms build on the foundations of the Sainsbury review, which enjoy cross-party support.

It is vital that we equip our young people with the skills they need in such a fast-changing economy and jobs market. As we look to reduce the skills gap, increase productivity and address structural changes as the UK leaves the EU, we must have a highly responsive and fit for purpose technical education system which is attractive to learners and parents.

So we are passionate about and committed to getting these fundamental reforms right. To make sure that we do, there are some concerns we want to share, to ensure the best possible offer for learners and employers alike.

The T-Level offer

We believe that there needs to be clarity of purpose around the T-Level offer for employers and learners. T-Levels need to have a clear and unique selling point to make them attractive to learners and those who advise them – whether they be professionals, family or friends. T-Levels will be offered at Level 3, alongside A-Levels, Applied Generals and apprenticeships and it will need to be made clear that T-Levels are not a second choice or runner-up prize to securing an apprenticeship or choosing A-Level studies. The employer levy could usefully have a role to play with employers in helping to support interest in T-Levels, work placements and securing ladders into technical employment.

There will need to be clarity on the proposed progression routes into and out of T-Levels, plus a mechanism to achieve some outcomes if a full T-Level programme is not completed. It is important for learners to know what a T-Level course involves, what the progression routes are and what the likely outcomes of the learner journey might be.

The timescale of the reform is already becoming tight. Learners who will be taking the first T-Levels in 2020 are currently in Year 9 and will have already chosen their options for study at Key Stage 4, which argues for a careful, managed implementation of the reforms and the move from current Level 3 provision.

We can learn from past lessons where difficulties with implementation have meant that good intentions, and potentially valuable developments in the vocational space, have not succeeded. The 14-19 Diploma, for example, foundered after only a few years, and left learners with a qualification which employers do not understand despite significant investment in its development and attempts by the sector to implement a workable solution. We want to help make sure that T-Levels policy avoids any such issues.

One of the issues is that the suggested intervention approach with T-Levels is so fundamental that it would leave no ecosystem to recover to, should the attempt to introduce T-Levels across the eleven technical routes not prove successful. That appears to us to be a high-risk strategy to adopt with few mitigations in place and the price we pay for failure could take years to recover. This is time that we simply cannot afford to squander.

You will already be aware that many have already voiced concerns about the work placement proposals. We are not clear how the Department for Education is going to engage with employers to enable or require them to offer the significant work placement exposure, which is a fundamental element of the T-Level programme of study. This was a significant factor behind the ultimate failure of the 14-19 Diploma programmes, which had a less ambitious target of two weeks' work experience. Yet we recognise how important meaningful work experience is to differentiate T-Levels from other Level 3 offers at this stage of education.

Choice and diversity

The vocational qualifications market operates in much the same as any other regulated market. While awarding organisations cannot compete on standards, they do compete on the level of service offered. Competition provides the learner with choice and drives innovation, responsiveness and cost-effectiveness.

Competition also prevents the risk of a single point of failure, a significant concern flagged up to the Department in the research it commissioned on the technical reforms from Frontier Economics. There is the potential that a quasi-monopoly position would be created for the duration of any contract, as flagged in the letter to the Department for Education from the Competition and Markets Authority.

While there is often discussion of the potential for a "race to the bottom", in practice the market works through having in Ofqual a regulator in place whose duty is to uphold standards in qualifications. We would expect Ofqual to take regulatory action against awarding organisations where appropriate and has been evidenced in Ofqual taking appropriate regulatory action where breaches occur. We believe that the risk of any race to lower standards is far less than the risk of market collapse which could be brought about by licensing.

The A-Level market delivers choice, competition and innovation in delivery of gold standard qualifications. That should be the model to which the Level 3 technical alternative aspires.

In the HE market there is an even wider choice of organisations with degree-awarding powers and a huge choice of qualifications. 50,000 undergraduate courses to choose from and that does not

deter potential applicants but provides innovation, choice and diversity. Nor is it cited as a complex, confusing and unmanageable system.

Apprenticeships operate in an open market with increasing numbers of end-point assessment organisations and external quality assurers invited into the arena. It is really not clear what benefit there is in adopting a wholly different market approach to T-Levels – as market forces and improved quality barriers could control the supply and dictate the shape of the offer as it does with other qualifications offered in a competitive regulated market. This level of intervention is all that is required and market opportunity plus regulation will weed out organisations that do not have the capability or capacity to succeed.

International Trade

Overseas revenue counts for a significant proportion of our member awarding organisations' turnover and much of that is sold off the back of UK accreditation activity. All of this work is highly valued by the Department for International Trade, the Department for International Development and the British Council.

We are concerned about the potential negative impact on the ability of the UK awarding industry to operate internationally. Having a single awarding organisation per pathway within a route will reduce awarding organisations' ability to deliver other qualifications in that route and will erode their ability to promote and export our excellent products and services abroad.

Where an existing awarding organisation loses a bid, this will affect its ability to deliver internationally; it could become uneconomical to maintain a qualification suite in a route or pathway solely for an international market. This would result in a reduction in expertise in the market, create a monopoly situation with little resilience or choice for providers and will not be in learners' best interests.

Given the uncertainties facing business including the awarding industry as we leave the European Union, now does not seem to be the time to be hampering the global exporting ability of UK education plc.

Certification

In addition to concerns over exclusive licence arrangements and copyright intervention it is really not clear why the Government would choose to be the sole supplier of certificates for T-Level programme output, when there is currently zero brand value in the Institute for Apprenticeships with learners, parents and most importantly employers.

In times of continued austerity it does not seem sensible to seek to inherit this complex and potentially costly task from suppliers that already do it as a part of the service that is offered. The certificates could still carry the Institute for Apprenticeships, Ofqual and Department for Education logos as recognition of national endorsement and the vital currency of existing UK AO brands would be retained.

Conclusion

We feel the Department should use the opportunity of its consultation to take careful account of the above points from the awarding sector.

In particular, the Government should consider carefully its approach on requiring the single awarding model for technical qualifications, level of IP intervention and desire to issue all certificates. There are clear benefits for learners and for the public purse in allowing a healthy competition to exist between awarding organisation providers, using the expertise that exists collectively across awarding organisations, to sustain the future needs of employers and learners alike.

The curriculum should be revised along the lines proposed by the occupational pathways and greater control of qualification design could be dictated through employer-led groups, with a high bar set for approved Awarding Organisations status policed by Ofqual. Those interventions alone would achieve the rationalisation and quality improvements the reform proposed.

I trust these comments are helpful to you – our members have sent you further, detailed comments on the formal consultation itself and feedback on the occupational pathways. We would very much welcome the opportunity to discuss face to face our thoughts on how we could further support the implementation of this important government policy as an Awarding Community.

I am copying this letter to the Chair of the Education Select Committee, The Rt. Hon Robert Halfon MP, and the Shadow Skills Minister, Gordon Marsden MP as it is vital that we work cross party to ensure the successful delivery of T-Levels.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Eeles', written in a cursive style.

Paul Eeles
Chair
On behalf of the Federation of Awards Bodies (FAB) Board

cc. The Rt. Hon. Robert Halfon MP, Chair of the Education Select Committee
Gordon Marsden MP, Shadow Minister for Further Education and Skills
