



## T level consultations – our responses

**This briefing summarises the main points we have made in response to consultations on the development of T levels.**

The consultations we have responded to are:

- The Department for Education (DfE) consultation [Implementation of T level programmes](#). Closed 8 February 2018; response published 27 May 2018.
- The Ofqual consultation on [regulating Technical Qualifications](#). Closed 6 August 2018; response published 3 September 2018.

A consultation on the content of the Health and Science T levels, among others, is expected in December 2018.

If you would like to know more about T levels and our related policy work, please contact the Education Policy team: [EducationPolicy@rsc.org](mailto:EducationPolicy@rsc.org)

We welcome engagement with our communities on our policy work. We are particularly keen to understand how providers and employers view the T level developments, and technical and vocational qualifications more generally. Please get in touch if you would like to share your opinions or experiences.

### T levels within the wider education system

We agree with the aim to simplify the technical and vocational qualification system, and that T levels may help to resolve technical skills shortages if appropriately designed and supported. A review of Level 3 qualifications other than A levels, T levels and apprenticeships may be relevant, but government should bear in mind that:

- availability of T levels and apprenticeships may be regionally dependent due to the presence or absence of opportunities for work-based learning; alternative routes may be required to allow all students in England to study an applied or technical level 3 science qualification
- assessment plans for some apprenticeship standards (including the Level 3/4 laboratory technician standard) incorporate level 3 qualifications such as BTECs
- 'good outcomes' must not be interpreted solely in terms of academic progression; progression to other educational routes and to employment are also valuable, including if progression is to a different sector than that most closely associated with the qualification
- Applied General qualifications frequently serve to widen access to Level 3 education and beyond.

### Qualification and assessment structure

We support Ofqual's role in regulating and accrediting the Technical Qualification (Core and Occupational Specialism components of the T level).

We agree that awarding organisations should set all assessments, with appropriate input from a representative range of employers into the design of the assessments and the grading standards. However, we disagree that awarding organisations should mark all assessments, as this may compromise validity for practical assessments.

Following the consultation, Ofqual will now permit centre marking of certain assessments in exceptional circumstances to ensure validity, which might include practical assessments for the laboratory technician specialism.

We questioned several aspects of the T level qualification and assessment design:

- The seemingly artificial division of 'knowledge and understanding', 'workplace skills' and 'technical skills' into separately assessed components of the T level.

- The lack of reference to technical skills in the design of the Core. In Science, for example, it would be relevant to cover basic laboratory skills and health and safety procedures in the Core.
- The different assessment approaches in T levels compared to apprenticeship assessment plans, when the qualifications are designed to the same occupational standards. In particular, the inclusion of a significant examined component for all T levels regardless of whether this is the most appropriate assessment method for the content.

We disagree with the mix of A\*–E and Pass/Merit/Distinction grading used for components of the T level as potentially confusing for employers, students and parents. It is unclear to what extent employers truly want to see the level of discrimination provided by A\*–E grading for the Core.

We oppose the proposal for a single assessment series in May/June each year, as not flexible enough for centres. Additionally, students who fail any aspect of the T level will not have any certificate to show for two years of work; a year is too long to wait for a re-sit in those circumstances.

Following the consultation, Ofqual will now allow up to two assessment series each year, with no fixed assessment windows. The timing of assessment opportunities and the availability of a second annual assessment series will be at the discretion of the awarding organisations.

While a T level cannot in itself result in the award of RSciTech due to the limited employment experience it will offer, relevant Occupational Specialisms and industry placements should be designed to provide a good base for students to work towards the award in the longer term.

## Industry placements

We support the principle of work placements for students following technical qualifications, but are concerned about:

- The potential workload implications for both providers and employers, and the lack of support committed for employers in particular; we have suggested the apprenticeship levy could be used for this purpose. We have pointed out that the chemical sector comprises a large number of small and medium-sized enterprises (SMEs) for whom the financial and time investment would be particularly significant.
- Potential barriers to students taking work placements or employers offering them, both in general and specific to our sector, including:
  - barriers to travelling to a place of work, especially in rural areas
  - regional distribution of employers limiting availability in some parts of the country
  - health and safety legislation preventing people under 18 being able to work in certain environments, including within the chemical and pharmaceutical sectors.
- The risk that students will not be able to complete their T level programme if providers are unable to find industry placements, or if arranged placements fall through unexpectedly.

We will continue to play an enabling role in establishing contacts between Further Education (FE) providers and employers. Additionally, we call upon government to work with providers to model anticipated demand for placements and ensure that employers are in place to deliver.

## Progression

- It should be recognised that a T level does not provide the same work experience as a level 3 apprenticeship. However, T level achievers should be able to progress onto apprenticeships above level 3 within the same occupational sector, with appropriate support.
- Recognition of prior learning should apply to students switching from an incomplete T level to a level 3 apprenticeship.
- Providers of higher technical education should be engaged in T level design, so that their admissions criteria can be taken into account, and so that they gain a good understanding of T level programmes.
- Adult learners are likely to require more flexibility in T level provision, such as part time learning.

## Delivery

The availability of technical equipment and the ability to recruit specialist teachers are significant challenges to providers in delivering T levels. Aside from sufficient funding, we called for training opportunities for teachers to be designed and made available in good time.

Following consultation, the DfE stated that up to £20m will be invested to improve quality of teaching, and that they will work with the sector to develop a programme of support for providers.

## Accountability

- We are concerned about proposed performance metrics for T levels due to the potential for perverse incentives. Completion, attainment and progress metrics are dependent on the nature and prior attainment of the intake, and cannot be used as a proxy for provider quality. Such metrics may encourage providers to not accept students who could benefit from following a T level programme.
- Performance of providers should be monitored, but in a supportive way, with help and guidance available for those who need it.