

Department for Education Education & Skills Funding Agency

Royal Society of Chemistry's response to the consultation on provider funding for the delivery of T-levels

February 2019

Response to selected questions from the consultation

Do you agree with the proposals for funding bands and hours set out [in the consultation document]?

In general, the funding formulae and bands set out in these proposals are reasonable and in line with other programmes funded by the ESFA. It is appropriate to fund T-levels according to their expected size, though this should be reviewed as T-levels are rolled out. Being new qualifications, the predicted teaching times may not be accurate.

However, while we recognise that these proposals are designed to be equivalent to arrangements for similar qualifications, we must draw attention to the general funding issues being reported by the further education sector. Funding per student aged 16–18 is significantly lower than that for 11–15 learners or undergraduate students, and many T-level providers will not be able to cross-subsidise T-levels from such other revenue streams. As an organisation interested in science, these issues are of particular concern to us; science apprenticeship numbers are relatively low, and we expect the number of available Science T-level places to be low – certainly in first instance – due to difficulties in establishing industry placements in relevant sectors. Low student numbers means the courses may be unviable for some providers to run even if there is a local need. Recruitment of science teachers is difficult throughout the education system, and made especially hard in further education if providers are not able to offer competitive salaries.

If the Department for Education truly wishes to achieve parity of esteem between academic and technical education then this aim should be accompanied by parity of funding.

Do you agree with the approach to allocating T-levels to funding bands, subject to further checking against the emerging content for each T-level?

The proposed approach is reasonable.

In this section, as in others, there is a disclaimer to the effect that proposals will only be carried through if possible within the funding available. The wording suggests that this may be done on a basis of reviewing subsequent allocations of T-levels to bands, suggesting that T-levels scheduled to be rolled out last may be disadvantaged. ESFA and the Government should be mindful that any reduction in content or quality of T-levels due to funding constraints could fundamentally damage the perception of T-levels. Rather than looking to restrict programmes, there should be an argument to uplift budgets to ensure successful roll-out of these new programmes.

Do you agree with the [suggested] method for allocating funding for industry placements for students on T-levels?

One of our major concerns regarding the T-level programmes is whether providers will be able to find sufficient high-quality industry placements to offer students. Beyond general concerns, specific issues related to the Science sector include

- unsuitability of some work places to persons under 18, due to health and safety regulations
- high proportion of small- and medium-sized enterprises (SMEs) in the sector, for whom supporting a placement is more likely to be an insurmountable burden
- unequal regional distribution of relevant employers.

While we support the principle of T-levels in general and the value of work experience in particular, all stakeholders must be realistic about these issues, and the best interests of students must be central. It would be unthinkable to be in a position where students have enrolled on a T-level and dedicated perhaps a year of study towards it, only to find themselves unable to complete the programme and gain their certificate because no industry placement has been found for them. The consultation states that, once funding transitions to a lagged arrangement, the second year's funding will be conditional on the placement being completed. We question whether withholding £275 for non-completion of the placement is sufficient incentive for providers to ensure all placements are appropriately managed. Clarification on how completion of industry placements will be audited would also be welcome.

As general points, the consultation says very little about consequences to providers (in terms of funding or otherwise) in the event of non-completion of the T level for reasons outside the control of the student. More broadly, we continue to see very little suggestion of support being made available to employers – especially SMEs – to allow them to provide placements.

Do you agree with the criteria set out in Annex A for the completion of an industry placement as part of a T-level?

It is not clear from the wording of the criteria how completion of the industry placement will be audited, nor the course of action if the provider and employer disagree on whether the student has met the criteria.

The requirements for the duration of the placements are not sufficiently clear as to how unavoidable absences, such as illness, will be managed. We would consider it unreasonable to require a placement to be extended if a student were, for example, off sick for one or two days out of 45.

The statement that a copy of the industry placement portfolio will be made available on request to future prospective employers is highly unusual, and potentially problematic as it may contain information that is business confidential to the placement provider. By whom is it expected that the portfolio will be made available, and for how long after the student has finished their course? Is this another administrative task expected of providers? We advise the Department for Education to reconsider. We can think of no comparable situation where learning documents produced by a student during a course of study, or by an apprentice during their apprenticeship, are routinely made available to prospective future employers. Equally, a prospective employer would not routinely be able to view performance review information from an applicant's previous role, unless the previous employer actively chose to share that information as part of a reference.

Do you agree with the proposals for ensuring that the extra funding for T-levels is made available in the year it is needed, before reverting to the usual lagged method of funding?

We agree with the principle of making funding for T-levels initially available in the year it is needed; it is likely that providers will have to make significant investment in the early years of delivering T-levels to ensure a smooth roll-out.

However, the proposals are not sufficiently clear as to what support will be available to providers who wish to grow their delivery over time, or move into other delivery areas at a later stage. For example, a provider may wish to begin delivering T levels only in subject areas they are very familiar with, and expand into other areas a few years down the line. It is important for ESFA to have a mechanism to accommodate and support providers in broadening their offer.

Do you agree with the proposals for applying retention arrangements for T-level programmes?

The proposals are not clear as to the criteria for the full payment of the second year of funding. The wording suggests that the second year of funding will be paid for any student who completes the qualifying period of 6 weeks. Again, we are concerned that this means providers may receive full funding even in the event that a student is not able to complete the T-level due to unavailability of an industry placement – the only penalty would be loss of £275 for the second year of industry placement funding. This puts students at risk of providers enrolling students to obtain funding, without being able to guarantee the student will be able to complete a placement. We advise that a mechanism should be in place whereby providers must demonstrate that they are able to provide sufficient good quality placements before enrolling students.

Do you agree with the approach for applying PCWs [programme cost weightings] to T-level programmes?

We agree with the principle of PCWs, ensuring that courses that are more expensive for providers to run receive higher funding.

However, we are at a loss to understand why the Science T-level is provisionally given a PCW of 1.0. The current Office for Students funding rates acknowledge that laboratory-based science courses are among the most expensive to deliver. These courses require investment in high-tech equipment and single-use materials in order to develop relevant skills. If the T levels are to prepare students for competences they need in modern workplaces, providers are likely to need ongoing investment to ensure that their laboratory facilities remain relevant. It cannot be assumed that providers will be able to support Science T-levels with the equipment that they already have. The PCW of 1.0 must be revised upwards, and due consultation conducted with providers to ensure levels of funding are appropriate to ensure successful delivery of the Science T-level.

Do you agree that disadvantage block 1 funding should be provided for T-level students on [the basis described in the consultation document]?

Do you agree that extra disadvantage block 2 funding should be provided for T-level students on [the basis described in the consultation document]?

It is excellent that the additional costs of supporting disadvantaged students are recognised. We use this opportunity to suggest that a similar measure be reintroduced in apprenticeship standard funding.

Do you agree that the Advanced Maths Premium and the Large Programme Uplift should apply for T-level students on [the basis described in the consultation document]?

We agree with the proposals. However, the suggestion that additional hours to accommodate very large programmes might be balanced by offering fewer employability, enrichment and pastoral (EEP) hours is concerning. It may be argued that EEP is particularly important in relation to T-levels; the success criterion for T-levels is the extent to which students are able to move on to jobs or higher level apprenticeships, which EEP would support with.

Do you agree with the proposals for ensuring there is a way that provision can respond to the skills needs of particular local areas?

As the proposals are not very specific it is difficult to envisage exactly how this will work in practice. They also appear incomplete, as the focus is on interventions where providers do not respond to local skills needs, with little mention of the role of employers. We consider it likely that availability of industry placements will frequently be a limiting factor on provision, without this being proportional to the local skills needs. For example, the science sector comprises a large proportion of small- and medium-sized enterprises for whom supporting industry placements may form a significant burden, leading to a lack of places even if the sector as a whole has a need for T-level achievers. What mechanisms will be available to resolve these issues?

We further note that if T-level provision purely reflects the local area, students may become trapped by their locality. At 16 they will not yet be as mobile as they might become later in life. Students in parts of the country where few employers are based locally may therefore have limited T-level options available to them. We recognise that this is out of scope for this consultation, but wish to record that the wider review of Level 3 qualifications must take this into account to ensure that all young people, regardless of location, have a good range of choices besides A-levels available to them.

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?

The funding calculations set out no provision for students with disabilities, who may be adversely impacted by the industry placements requirement. Students with disabilities are more likely to require additional assistance, for example in travel or workplace adjustments. Providing an additional funding weighting will advance equality of opportunity for these students as the cost impact to providers can be mitigated. The proposals for the disadvantage funding include factors relating to deprivation and low prior attainment; neither is directly correlated to disability, and the support required is of a different nature.