

Department for Education Consultation on Implementation of T level programmes.

Launch date 30th November 2017

Response by 8th February 2018

Response provided by: GTA England

Question 1: Do you agree that the principles outlined above are the right ones on which to base a review of which 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?

We agree with the principles stated, but there should also be a principle around creating a system of continuous improvement. The system will need to be improved in the light of the changing needs and structure of the economy. As will be reported later, the procurement process needs to accommodate this crucial factor.

Once implemented, T Levels must be given sufficient time to become embedded and developed over time in the light of operational experience which will identify continuous improvement opportunities.

T levels need to support progression to good outcomes. However, it needs to be recognised that many engineering apprenticeships at level three have both breadth and depth and take an apprentice between 36 and 40 months to complete. Therefore progression from a T level will still require the student to undertake a significant level of top up, even if that may be mainly on the job experiential learning to allow them to demonstrate skill, knowledge and behaviour to the same standard as an apprentice achieving the same level. It is not believed from the consultation that this is adequately recognised.

Question 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?

We would support the principle objective of reviewing level 2 qualifications to identify and create progression pathways. There are sound level 2 qualifications in existence, the content of which could be embraced within T levels in a “foundation” stage. There is merit in these qualifications existing outside of T levels in order to allow for progression from more preparatory provision. These level 2 qualifications also secure progression straight into employment and/or Apprenticeships where the economy requires it.

Question 3: Do you agree with the proposed approach to assessing technical qualifications? Yes/No – Please give reasons for your response.

Classroom delivery is referred to throughout; it is vital that the wider training environments are recognised, such as workshops, laboratories and simulated work environments. We also believe that T levels should be developed to ensure that knowledge skills and behaviours

are not assessed totally separately to each other and that work based or related projects are used to both deliver and assess progress. To simply assess knowledge skills and behaviours in isolation, without the context of the current requirements of any given occupation, could lead to discreet education and training delivery. In our view this would totally miss the point that employers are seeking competence and understanding “in the round”.

It is hoped that the design of the qualification allows the core employability skills and the occupational specialism component parts to be taught and assessed holistically. A high degree of engagement with employers will be required to ensure the employer-set projects are relevant and up to date; and do not rely solely on the AO or teaching staff in the college or training provider who may well be significantly out of date with current occupational requirements.

Care needs to be exercised in the make-up of the core and specialist structure of T Levels. There are potential issues in that the content of T Levels may become ‘too generic’ to inform progression. This appears the case due to the amount of GLH available for the technical content. At the lower level of GLH of 900, this could equate to 12.5 hours per week over 2 years. Many of the current level 3 engineering standards require a Technical Certificate at level three which are either recognised at Certificate, Diploma or Advanced Diploma level and typically require between 720 and 1150 GLH of part-time study over the first two years of an apprenticeship.

Question 4: Do you agree with the approach to grading technical qualification components? Yes/No – Please give reasons for your response.

We have mixed views on the suggestions being made. Firstly we would suggest that the grading approach should match that in place for A levels to aid comparison. However we equally welcome, and can see benefit, in the additional information and indicators the proposed grading structure and the level of granularity will provide to potential employers.

It is felt that the mixing of grade terminology between ‘E-A*’ and Pass Merit, Distinction will lead to confusion amongst the less informed employers, parents and guardians and would suggest all components should be graded in the same way i.e. Pass/Merit/Distinction, which would also have parity with the proposed apprentice grading system.

The relationship of T Levels to work based competence programmes such as Apprenticeships needs to be clear. It is important that learners are clear that T Levels, although an important introduction to occupations and the world of work, will cover a significant element yet only a minority of the occupational competence employers would expect for many STEM related job roles.

Question 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 and achieving parity with A levels, is of paramount importance if employers and other stakeholders are to have confidence in the T

level qualification. However, further information about how this will be achieved and how universities will award UCAS points is required.

We certainly agree that grading needs to be consistent year to year and therefore any attempts to moderate results each year must be strongly resisted.

The quality of the assessment methodology for the core employability skills, occupational specialism and the quality, depth and breadth of learning outcomes of the work-based placement need to be given full and careful consideration. There is a risk in judgements being widely subjective creating issues in moderation.

There is also a concern about a lack of widespread availability of the many different pathways and route choices within the different T levels. They all need to be seen to be comparable by all key stakeholders.

Question 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.

Yes it makes sense that the core of each T Level in a route (Manufacture/Engineering) is structured in the same way and with similar content: the principles and practice of health and safety; understanding engineering drawings; materials, engineering calculations etc. This will enable the APA/L of learning and increase transferability and progression.

However, at this stage we are slightly concerned as to how we can design a common core for the range of occupations and therefore the bespoke skills and knowledge requirements that are addressed by our occupational map. We suggest that further sub groupings or clustering may be required.

In STEM subjects the common core may have to be larger than perhaps other routes and larger than the current guidance on the size and duration of the component elements of the T level.

Question 7: Do you agree with the proposed approach integrating the work placement within the T level programme? Yes/No. please explain your answer. If no, what would be a preferable approach?

There is a concern with the regular reference to “class room based” learning. In technical occupations, introduction and practice in a workshop setting is essential in order for the learner to appreciate and demonstrate the correct understanding and in the application of tools, equipment and processes.

It is also suggested that periods in workshop settings which replicate the norms of the workplace are required. Such norms include attendance patterns and expected behaviours. This can be introduced immediately prior to work placements but ideally, as in group

training associations, from inception. It is considered an essential requisite to prepare the learner for the experience of work.

It would be considered best practice to encourage employers to participate in the delivery of T Levels by way of master classes and so on. Part of this activity could also include covering the context of activities in the workplace. Additionally, employers should be encouraged to define low level work issues to which the learners can devote a significant part of the work placement to producing recommendations. This suggested approach would help provide evidence for the employer reference.

We agree that some flexibility regarding the timing and pattern or the placements is required, but would suggest as currently defined it is too loose. We believe a placement one day a week when compared to a block placement could provide widely differing experience, expectations and outcomes.

There is a whole infrastructure of organisations well suited to supporting the generation of employer interest in providing work placements. The 'Work placements – capacity and delivery fund from April 2018 to July 2019' is currently only being offered to providers who are now offering similar programs and misses those providers who focus on apprentice delivery only and arguably have better and more robust employer engagement strategies. Therefore capacity building funds for all providers no matter what their definition. Additionally, Levy funds could also be used to incentivise, organise and engage employers.

However, the sourcing of the quantities of quality work placements required should not be under estimated

Question 8: Do you agree with the proposed method of appraising the student's performance on their work placement, including the Employer Reference? Yes/No. please explain your answer. If no, what would be a preferable approach?

It would be considered best practice to encourage employers to participate in the delivery of the T Levels placements. However methods of ensuring that the appraising/assessing of a student's performance is fair and equitable, needs further consideration and structure.

Some providers including group training associations, will be better than others at providing employers with the right level of support to define and assess learning placement outcomes. We strongly suggest this should be a large factor in assessing providers as being capable of offering well managed and run T level programmes.

Employers may be wary of giving students a 'Reference' and most, for legal reasons, will give nothing more than 'worked here between this date and this date'. Perhaps whilst employers can and should contribute to the assessment of the outcomes achieved as a result of the work placement, the training provider, moderated by the AO should lead this part of the assessment. However, employers should be encouraged to define low level work issues to which the learners can devote a significant part of the work placement to producing recommendations. This suggested approach would help provide evidence for the employer reference.

The quality assurance of placements will be extremely important. Inadequate arrangements will lead to a huge uncontrollable variable effecting the student's experience and achievement of T level.

Question 9: Do you agree with the proposed approach to quality assurance set out above? Yes/No – please explain. If no, please explain how we can ensure work placements are quality assured?

There is a concern with the regular reference to “class room based” learning. In technical occupations, introduction and practice in a workshop setting is essential in order for the learner to appreciate and demonstrate the correct understanding and application of tools, equipment and processes. This is potentially exacerbated in relation to colleges/providers track record in the providing the appropriate linkage to the world of work and work with employers to allow the essential elements of learners appreciating and demonstrating the correct understanding and application of skills, knowledge and behaviour requirements in the workplace..

The Placement agreement should reflect best practice in other programmes which have similar arrangements including group training associations, Education Business Partnerships and in the best delivery in the Study Programme. In addition to the features covered in the consultation paper it should encourage mentors in the workplace.

Question 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?

Additional support should include flexible working as per the norms associated with adult workers in the same occupation, but with the additional requirement of responding to safeguarding issues due to young or vulnerable workers being present.

The consultation does not define or explore how the requirement of the DBS, or risk assessment will be applied to work placements.

Question 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?

It may be appropriate to consider what financial support there should be both for the student and provider when residential provision may be required. For example where there are no relevant work placements on offer, or where the occupational opportunities do not exist in the providers or students locality, or are only available in specialist employers i.e. marine/boat building, motor sport etc.

We would suggest any additional financial support for the student should be managed via the training provider funding, however care will need to be taken to ensure any such support is comparable with other similar programmes including apprenticeships, and

compatible with guidance provided by the Government's Department of Work and Pensions.

Employers ought to be able to utilize the Levy to encourage the availability of work placements. In non-levy scenarios, funding should be made available to secure placements.

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

We feel it would best if this took the form of a training allowance set nationally but administered by the training provider. This should be structured in the same way as a wage i.e. stoppages for lateness and absenteeism.

There is merit in a student work place allowance that also covers at least a minimum value for travel expenses.

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

As previously covered, the acquisition of quality work placements in the volumes required should not be underestimated. Employers are already subject to contact to provide similar activities and a convincing case will need to be articulated as to why they should get involved in offering work experience placements for T level students.

Some of the barriers will be the size of the employer and their ability to provide the staff resource to supervise, train and mentor such students and the distraction this will cause to their day to day business.

Some will undoubtedly see it as part of their CSR responsibilities, but we would suggest that those types of employer are already engaged in some form of business educational linkage.

Others will cite their concerns about offering work placements for young minors and the extra demands this will place on them in terms of providing a safe and safeguarded work environment and one that is able to accommodate the additional risk assessments required through having an unskilled employee in their midst.

However, the existing education and skills infrastructure including group training associations could be utilised to provide access to employers. As previously mentioned, funding would need to be available for this to take place.

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

We believe the concerns and challenges will be very similar across industries and locations, although there will always be some that break the norm.

Undoubtedly some industries, for example nuclear, extractive and slaughter houses may well have higher concerns about offering placement to minors under 18 due to the perceptive higher risk and regulation associated with their industries.

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

It is important that the SME market is not understood as a totally homogenous group. Although there may be some core features some workplaces will be open to and capable of providing quality placements.

Our experience would suggest that it is not the application of such labels to the size of the business, but rather the size and infrastructure of a particular work place location or site. Some SMEs are part of larger groups.

Larger organisations may also struggle to provide placements because of head account restrictions, and are no better placed than SMEs, in terms of the HR and training support available.

That said, funding should be available to build capacity for all Providers to provide employer placements, not just colleges. The wealth of experience amongst private providers including GTAs, could produce placements with the availability of funding. There are benefits to the provider and employer (outside of the T level delivery organisation) in providing placements which will significantly aid progression of T level learners into the Apprenticeship programme and/or employment.

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

We are not convinced that such Kitemarking would encourage employers to participate. That isn't to say that there ought not to be criteria for placements to meet – the availability and high quality of work placements is an essential element of the T Level programme.

It may however, be worth considering some form of national recognition on a Regional and National basis, in the form of an Award and prize giving ceremony which could also stimulate participation by employers.

Question 17: Should students be able to opt to take a higher level maths or English qualification e.g. core maths, A level 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?

Yes, this should be encouraged particularly within STEM subjects as often these qualifications form the 'spring board' for an individual's career progression. Not only will the provision of higher level maths assist transition into Apprenticeships; it also supports progression to further education and learning programmes which can be taken whilst in employment. This assumes that appropriate funding is available to support additional or higher maths programmes.

Any good or conscientious training provider should be able to manage a cohort of mixed abilities and should be able to offer differentiated programmes matched to the needs and aspirations of their learners.

Question 18: Which of these options for funding maths and English within the T level programme do you think would be the most appropriate? Please explain the reasons for your answer.

Option two is supported, as option one does not fully recognise the extra costs involved. T levels need to be aspirational and allow individuals the opportunity to achieve their maximum potential.

Employers need to have the confidence that all T-Level students have received the same level and amount of technical training in achieving the required standard for the occupation the student wants to move into post-study.

Given that the T-Level will be an up to five day a week time commitment, providers and learners will need to be flexible in how additional maths and English are delivered around the wider syllabus.

Question 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? If not, why not?

Occupationally specific qualifications should be included and remain as standalone qualifications and not be subsumed into the wider T-Level; as they should remain available for employers to use where necessary outside of T-Level programmes. The qualifications should only be included where they are in line with health and safety and regulatory requirements.

Question 20: Do you agree with the information we propose to include in the certificate? Yes/No – Please explain your answer.

Notwithstanding the points earlier, it is right that the individual components of the T-Level are all listed separately. It will be helpful if the components could be listed in their equivalent UCAS points value too, given that one purpose of the T-Level is to prepare people to enter higher education.

A grade could also be given for the core content of the T-Level, not just the specialisms, so that employers are easily able to assess a candidate's general knowledge of the occupational area and thus able to assess their potential suitability for other roles.

Question 21: Do you agree that partial attainment should be reflected in the proposed transcript? Yes/No. Please give reasons for your response.

Yes this principle is fully supported.

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

Clearly we would we would want to see the academic and vocational apprenticeship and T level content aligned to ensure learners can have seamless progression without having to rework content or qualifications. The recent announcement that the IFA will now accept knowledge qualifications in Apprenticeship standards significantly assists.

As we have already mentioned, some apprenticeships at level three take significantly longer than two years to complete. From an employer's perspective, this means there will be gaps between the work based skills of a T level student compared to an apprentice. Therefore, it seems essential that progression into work from a T level must include recognition that additional training and skills are required to equate to successful completion of an apprenticeship.

The consultation document does not outline how a student will make the progression into level three occupation and that 'top up training' will be required along with an appropriate level of funding. Similarly, the requirements regarding EPA needs to be explicit. Without this level of clarity we risk increasing confusion and potentially having dual standards for a young entrant to the level three employment market.

Similarly, we are keen that students who have completed a T level qualification will be able to progress in apprenticeships at level 4 and above, however it has to be recognised that some form of bridging course may be required, particular if the student hasn't got their levels of Maths and English up to A level standard.

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

As has been articulated in responses to previous questions this will depend largely on HE institutions accepting T levels as being comparable to A levels and other existing qualifications. Particularly, in the case in engineering and manufacturing, other qualifications include HNCs/D's and foundation degrees. The suggestion included earlier to record UCAS points on certificates will assist.

Additionally the inclusion of higher level Maths in T levels will also support progression. However, it is fully recognised that for some students who do not attain A level standard in their English and Maths, bridging programmes will be a necessary stepping stone.

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

The UTC model is designed to do this, and we should consider any best practice from them.

Within the group training association model of delivery, many engineering apprentices who have completed or are completing their level 3 apprenticeship move on into HE, in some cases whilst commencing the third year of their apprenticeship. Although not totally related

to T levels, there is a huge opportunity to “formalise” this level of learning into the apprenticeship model of delivery. This would reinforce knowledge gained in an off the job environment being integrated work based competence practice; also increasing the value and application in the workplace.

Question 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?

Training providers should be able to determine what each student needs, and the funding should support designing programmes responding to learning styles.

However we believe if T levels are to be seen as aspirational and on a par with A Levels, similar entry criteria should apply. In addition, recognition should be given to students who may thrive in a more technical and vocational pathway, within the mix of entry requirements.

Overall the apprenticeship routes and the T level route have to be designed to allow students to enter at the appropriate level, without setting them up to fail, and to subsequently allow progression to higher level apprenticeships and/or HE study.

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

If T Levels are to be held in high esteem and typically be the size of three A levels, delivery is likely to be required on a full time attendance basis. The accreditation of prior experience and learning must be followed for all learners and it is of paramount importance regarding adult learners.

It is expected that adult learners in employment will benefit from undertaking the Apprenticeship programme, rather than T levels, especially when the existing job role is within the STEM footprint. Relevant prior work experience, where an employer reference can be provided, could enable an adult learner to bypass the work experience requirement.

Question 27: What do you think the biggest challenges 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*

There is a wealth of high quality experience within the existing education and skills infrastructure to best respond to the implementation of T levels. Therefore, It is strongly believed that the delivery of T levels should not be the sole domain of FE colleges. We believe providers (perhaps rated grade two and above by Ofsted), whether they be a College, a Group Training Association, Private Work Based Provider, UTC or Employer

Provider, currently delivering apprenticeships will be best placed to deliver T level programmes.

The challenges listed in the bullet points above are not new for many providers. However, opening eligibility to deliver T levels to the widest definition of the education and skills infrastructure, should also open up eligibility for funding to provide the right facilities, equipment, recruitment of appropriate staff and provision of ongoing CPD.

Question 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?

It is accepted that marketing needs to begin now. However there are difficulties in that the pilots are not yet able to provide information in the light of operational experience - case study materials always provide a strong reference sell. Once such information is available the positive messages must be communicated in national campaigns. There is already negative press about T levels and this needs to be balanced by the positive messages the Department is able to release.

Of equal importance to parents and young people is marketing to employers, particularly if we want them to offer the relevant high quality work placements that T levels will require.

The DfE Careers Strategy also needs to ensure that it embraces and prepares people for giving effective and impartial careers guidance in general on all routes as well as T levels.

Question 29: How much engagement do providers currently have with industry professionals in shaping the curriculum, teaching, and training other members of staff?

We would point to the group training association model of employer engagement here as best practice. GTA boards are structured with employers who are also customers of the training. This ensures high degrees of engagement in curriculum design ensuring training meets business needs. However, the approach outside of the GTA model will vary by provider, the best will do all of the above and more, whilst the worst will struggle to secure the required employer engagement.

Question 30: What challenges will providers face if they want to bring in more industry expertise?

Delivery organisations at the lower end of the spectrum for sound employer engagement will undoubtedly face a higher level of challenge.

There will be various challenges in bringing engineering talent from industry into the provision of T-Levels. An exacerbating factor is that within the AME sector, the general shortage of skilled and qualified engineers, means there is little spare capacity within the existing workforce to allow engagement.

However, there is an opportunity to encourage the engagement of larger companies in the development of T levels and the provision of work placements should the Levy be allowed to be utilised. Funding to support non-levy companies through their providers

ought also to be made available.

Question 31: Should we seek to further influence which T levels are offered by providers, according to local and national skills needs? Yes/No. If yes, how should we do this? Yes/No. If yes, how should we do this?

In order to be successful, T levels must respond to employer needs and therefore employer involvement in their design, and in elements of delivery, is considered essential. The commissioning of T Levels must include evidence that they respond to local, regional and national skills needs.

If this is not a feature of the procurement process, the availability of T Levels will be supply driven. The Skill Advisory Panels must be designed to have a role to play in this regard. Additionally, the needs identified by other commissioning bodies, especially LEPs, should be part of this arrangement.

Question 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?

Please see response to question 29 and 31.

In addition, it is worthy of note that the Trailblazer process for creating apprenticeship standards has created partnerships of employers and delivery organisations and other key partners including awarding organisations. There is a possibility that such networks could inform the development and delivery of T levels.

Question 33: What additional support will providers need to ensure that T levels meet local skills priorities?

As commented earlier, procurement of T levels should be open to all classifications of organisations within the existing education and skills infrastructure, particularly those with a rich experience and track record in engaging employers as in the Apprenticeship programme. Group training associations, particularly, with sheltered learning environments reflecting the norms of the workplace, would be well placed to respond.

In supplement and enhance provider knowledge and employer engagement activity, the provision of accurate local labour market information by SAPs, combined with local employer insight, will be very useful.

Question 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?

The correct balance has to be struck regarding copyright. Should the arrangement extend to allow most aspects of the qualification be available for "incoming AOs" it could inhibit the

development of robust qualifications. It could further reduce the number of AOs which are willing to bid.

Perhaps a solution is around copyright extending to the: design of the qualification which has to demonstrate alignment with Apprenticeship standards; and the overall qualification specification; and the assessment strategy. With a fixed schedule for review to ensure employer needs are accounted for, the IFA panel can play a vital role assuring relevance.

Question 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?

Partnerships or consortiums of AOs is seen as the solution to the procurement process. This would spread risks and build on current occupational specialisms. It would also reduce the “incumbency advantage”.

The challenges regarding excessively long contract terms of say, 10 years, are likely to reduce competition with AOs diversifying into other areas or, at worst, ceasing trading. AOs unsuccessful in securing T level contracts, in seeking other activities in which to trade, may lose the organisational competence in processes and specialisations (including occupations). The Institute and Department are encouraged to work with AOs who are best placed to comment on the length of contract awards.

Question 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?

Partnerships or consortiums of AOs is seen as the solution to the procurement process. This would spread risks and build on current occupational specialisms. It would also reduce the “incumbency advantage”.

The challenges regarding excessively long contract terms of say, 10 years, are likely to reduce competition with AOs diversifying into other areas or, at worst, ceasing trading. AOs unsuccessful in securing T level contracts, in seeking other activities in which to trade, may lose the organisational competence in processes and specialisations (including occupations). The Institute and Department are encouraged to work with AOs who are best placed to comment on the length of contract awards.

Question 37: Are there other variables (in addition to those listed in the text above) that could influence the return on investment for AOs? How might these factors influence interest from the AO sector for initial and further competitions?

In addition to the factors described in the consultation an additional factor may have increased costs as compared to existing practice. This is around the ensuring relevance of T levels: continued alignment with Apprenticeship standard and therefore the meeting of employer needs.

Question 38: Which of proposed performance measures are most important? Please explain. 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.

All of the measures are important. Previous attempts to collect destination data have had mixed success. As this is a particularly critical measure, consideration should be given to incentivising its collection as the destination may be measured some months after completion of leaving the T level programme.

Additionally employer and student feedback should be included.

Question 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?

The funding of T Levels should accurately reflect the set up costs and bear in mind that disciplines such as engineering, will be higher than others. Also, this ought to be factored into the delivery costs recognising that T levels may vary in size making a universal rate inappropriate.

Consideration ought to be given to a degree of outcome related funding into the destinations of learners. However, this may best be introduced after the pilots.

Question 40: How might we adapt funding flows to AOs to make sure that the full range of T levels is available to students around the country?

As mentioned in 31, the procurement process must be cognisant of national regional and local needs and the planning arrangements of other provision including LEPs and, potentially, employer trailblazer groups and so on. This is considered critical in order for T Levels not be supply side driven.

Question 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? Please provide evidence to support your response.

There is a continuing gender imbalance in UK engineering, with just 6% of registered engineering professionals being female. T-Levels could be part of the solution to this problem, in engineering and in other sectors, but it will be crucial to ensure that the careers advice given to girls at school includes information about T-Levels and technical routes into work including Apprenticeships.

Positive action activities of experiencing T levels AND work experience for underrepresented groups should be considered. The 14-16 Pre-Apprenticeship programme is an excellent example of pre-school leaving age provision which could make a difference to the recruitment of disadvantaged groups. However, this should not be restricted just to T Levels but also include Apprenticeships.