A Qualified Success

An investigation into T-levels and the wider vocational system

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About the Author

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He has spent over 15 years in the world of education. He began his career teaching A-level Psychology at one of the country's leading state schools, having gained a BSc in Psychology from the University of Birmingham and an MSc in Child Development from the Institute of Education in London. After three years in teaching, he moved into politics to work on policy development and research across the education, skills and welfare sector. This included roles at think-tanks such as Policy Exchange and the Social Market Foundation, Pearson, G4S, a leading professional body and also working for an MP.

He subsequently spent two years as an advisor to ministers at the Department for Education, first under Michael Gove and then Nicky Morgan, where he helped to design and deliver new policies as well as improve existing ones. After leaving the Department for Education, he spent two years teaching at a Sixth Form College in London and then moved back into education policy and research, first at Policy Exchange and then at the Reform think-tank.

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Foreword

by Rt Hon Ruth Kelly, former Secretary of State for Education and Skills

For decades, 16-year-old school pupils have been faced with a dramatic fork in the road. Those who are academically minded can choose to continue with further study, culminating in A-levels. From there they tend to go on to study at university, making it more likely that they will end up in highly skilled and well-paid jobs. At present, our education system works for the most academically gifted, not least because Britain is home to some of the world's best universities.

But for those who are not academic, things are far less straightforward. Despite numerous efforts from both Labour and Conservative governments, no prestigious alternative skills-based qualification has stood the test of time – and few truly successful schemes have helped people towards skilled employment. They have faced, far too often, the soft bigotry of low expectations. And at the end of it all, they are far more likely than their academic peers to end up in low-skilled, low-paid work. That is frequently after churning around in the system for a year or more. The Government currently recognises that around a quarter of all 16-year-olds in the education system spend their time switching between course types and repeating their studies.

In other words, the UK's post-16 education structure cements social division. The choices that are forced on those who have just taken their GCSEs arguably have an even greater impact on their lives than the old divide between those who went to grammar schools and their peers who went on to secondary moderns. Lives and prospects are changed in an instant, predetermined by a flawed and a prevailing intellectual snobbery that, sadly, has treated technical education as something for "other people's children".

Successive Governments have tried to put this right. When I was Education Secretary, the Labour Government introduced Diplomas, which succeeded GNVQs as an attempt to end the split between academic and technical qualifications. Ultimately, as this research paper documents, two key lessons were learnt at the time. Any new qualification needs significant time to gain currency among employers, schools, parents and students. The plug was arguably pulled too soon. It also needs to be straightforward. A flaw in Diplomas was that they did not make the system any more transparent or easier to understand, with too many versions of each subjects made available.

The challenge now, particularly as we leave the European Union and are less likely to be able to rely on skilled workers from abroad, is to make sure that the skills agenda is properly valued here in the UK. Apprenticeships are

beginning to become established but there are clearly teething problems, including with the apprenticeship levy. It is also not yet fully clear how T-levels will work alongside apprenticeships.

This important paper from Policy Exchange highlights some very useful lessons from previous attempts to bridge the divide between academic and technical education. Policymakers would do well to reflect on the issues raised here and ensure that they are addressed so that we can rise to this challenge successfully. It will affect not just those who gain qualifications but all of us who will benefit from a more productive economy.

Executive Summary

The contrast between the stability of academic and vocational qualifications in this country could not be starker. A-levels and GCSEs have existed in some form for almost 70 years, and their purpose and character have remained largely unchanged over their impressive lifespan. Meanwhile, numerous waves of vocational qualifications, training schemes and government programmes have come and gone in that time, costing around £100 billion in the last forty years alone.

Tackling skills shortages, simplifying the vocational offer, improving social mobility, delivering 'parity of esteem' and boosting our international competitiveness have invariably been cited by successive Prime Ministers and Education Secretaries as reasons why the previous set of qualifications or programmes has plainly failed and why we need to start all over again. It is into this enduringly unstable landscape that 'T-levels' have been put forward.

What are T-levels?

T-Levels are two-year courses that aim to give students a technical alternative to A-levels at age 16. Each T-level consists of:

- a qualification that includes technical knowledge and practical skills
- an industry placement of at least 45 days
- relevant maths, English and digital skills
- workplace skills

Education Secretary Damian Hinds has described this new suite of qualifications – the first three of which are scheduled to start delivery in 2020 – as "a once in a lifetime opportunity to reform technical education in this country so we can rival the world's best performing systems." However, the two most prominent attempts to introduce a new set of technical qualifications over the last 30 years – first, GNVQs and NVQs in the early 1990's; and second, Diplomas in 2007 – ultimately failed. Both had considerable political backing and were supported by a sizeable financial investment too. Recent government publications and senior officials involved in T-levels have repeatedly insisted that they have 'learned from the mistakes of the past'. This new report has investigated whether the introduction of T-levels does indeed show signs of learning from past mistakes.

Who will study T-levels?

The Department for Education (DfE) has been adamant that these new qualifications will be "a high quality, technical alternative to A levels". Students support this message too as "they want T Levels to be as well respected as A levels". While these ambitions are reasonable, the reality of the 16-19 education system poses considerable challenges for establishing this new set of qualifications. For instance, it will be up to schools and colleges to respond to learner demand for T-levels, and if this demand does not materialise then providers are under no obligation to provide these courses.

In 2017, only 42,000 learners took an existing technical qualification with no other qualification alongside it. When such a small number of students will be spread over 15 T-level routes in future, covering huge numbers of occupations across thousands of schools and colleges, the issue of viability becomes a concern. One college principal told the Education Select Committee in October 2018 that she would be 'surprised' if as much as 10% of her students took a T-level and that "I think it would be less than that to start with", and this small cohort will be split across the three T-level pathways being trialled in 2020.

Another problem stems from the fact that technical education in England has long-suffered from a 'lack of prestige' compared to A-levels. Addressing this will be largely beyond the DfE's control because the DfE will not centrally impose minimum entry requirement for T-levels. If T-levels fail to attract learners with strong GCSE grades, it will be difficult for them to build a reputation as a prestigious option for young people. The related question of whether T-levels are better suited to schools or colleges is also not one that DfE has openly engaged with. Some of the schools and colleges that have come forward to deliver the first wave of T-levels in 2020 have little or no experience of technical education.

Are T-levels being introduced at the right speed?

The need to provide hundreds of thousands of work placements for T-level students remains the biggest implementation challenge facing the reforms, as only 8% of employers currently offer placements of the duration required for T-levels. Research commissioned by the Department for Education (DfE) has also found that many employers are already "reaching a 'saturation point'" in terms of offering work experience and placements, and among smaller employers "there was a reluctance to divert resources away from employees' usual work in order to train and supervise a young learner". This research even found that some employers felt that the nature of their work "made it either inappropriate or legally impossible to support young people". Crucially, the research identified the likelihood of trade-offs between employers' willingness to offer T-level placements and their ability to continue with apprenticeships. For many employers to be unable or unwilling to provide work placements for T-level students is both understandable and troubling.

Such is the level of concern around their implementation, the Permanent Secretary at the DfE publicly wrote to Damian Hinds in May

2018 to recommend that the start date for T-levels be deferred to 2021 and requested a written 'ministerial direction' should the Education Secretary wish to stick with 2020. A ministerial direction is most frequently used when a department thinks that a planned policy is unfeasible or represents poor value for money. For Damian Hinds to have been asked for a ministerial direction – the first one issued at the DfE for at least 30 years – suggests that civil servants have a very different view from the Education Secretary on the likely success of the T-level reforms given their current trajectory.

Are the ambitions for T-levels appropriate?

The reviw of technical education chaired by Lord Sainsbury (the 'Sainsbury Review') in 2016 stated that the main purpose of T-levels is to devlop the technical knowledge and skills required to enter skilled employment. However, T-levels are supposed to allow progression to a higher / degree apprenticeship and studying higher-level technical qualifications as well. Moreover, to support progression from T-levels into university degrees, the Sainbury Review said it was "essential that clearly signposted 'bridging provision' exists so that individuals can move between academic and technical education options." Over two-and-a-half years since the Sainsbury Review was published, it is still not clear whether this bridging provision will exist when T-levels commence or what form it will take.

The response from universities to T-levels has also been noticeably lukewarm. Imperial College London has even stated that "we do not believe that T levels provide a suitable preparation for students". Some universities have indicated that they might accept T-levels in principle but would make decisions on a case-by-case basis. Unsurprisingly, most universities have not made up their minds over whether to accept T-levels and blame their reticence on the lack of detail available.

One of the most controversial aspects of the T-level reforms is the Government's decision to adopt a 'licensing approach' in which T-levels will be offered and awarded by a single body or consortium under a fixed-term licence. This was in line with the Sainsbury Review's concern that our market-based system of qualifications promotes a 'race to the bottom' among Awarding Organisations (AOs). The same licensing approach was put forward for reforming GCSEs in 2012, only for the DfE to be forced to abandon their plans in the face of numerous logistical problems as well as considerable opposition from the Education Select Committee and many others. Concerns over licensing are now resurfacing with T-levels, even though the DfE's own research in 2017 acknowledged that their plans introduced "a risk of system failure". While a legal challenge in July 2018 against the plans was subsequently dropped after the DfE watered down some of their demands, the licensing model has inevitably increased the likelihood that the predicted 'system failure' may come to pass sooner rather than later.

Is there clarity for stakeholders over the purpose of T-levels and their links to other pathways?

It remains unclear how T-levels are supposed to link to apprenticeships. In addition, T-levels appear to ignore all the international best practice on how to link such qualifications to apprenticeships. Analysis by the OECD suggests that the T-level reforms could end up making the system even more 'fragmented' and 'confused' than it already is, even though this "landscape of confusion [has] by common consent has been one of the weakest points in the English vocational training system".

T-levels have effectively been set up as competitors to apprenticeships, which will leave them struggling for credibility when sat alongside an established training route. The Sainsbury Review wanted there to be "flexibility for individuals to move between the two modes of learning within the technical education option" without any explanation of how this might work.

The process by which students move onto T-levels to begin with has thrown up another set of issues. The Sainsbury Review proposed a 'transition year' to help students access T-levels if they were not able to do so immediately after their GCSEs. Nonetheless, as with the bridging provision, there is still no information available on what this transition might involve. It is unclear what the transition year could offer that the existing set of programmes such as Traineeships and Apprenticeships cannot provide. Moreover, the relationship between T-levels and Applied General (AG) qualifications as well as existing vocational qualifications at Levels 1 and 2 or at Levels 4 and 5 remains undefined. This lack of clarity means that students, teachers and employers will be left guessing as to what the overall system might look like even after the first waves of T-levels are introduced.

Do T-levels overlap with other qualifications?

If T-levels are to succeed, a clearly defined purpose combined with clear dividing lines between all the various qualification pathways – A-levels, AGs and technical education – will be crucial. As it stands, the lines separating qualification pathways are too blurred and the scale of duplication across these three main pathways is plainly apparent. Accounting, Art and Design, Business, Computing, Environmental Studies, PE and Science are all found in each of the three pathways, making it almost impossible for young people, parents, teachers and employers to navigate the system. Even if T-levels manage to simplify the technical education route, this will not solve the widespread issues caused by a lack of differentiation in the purpose and characteristics of many other qualifications.

There also appears to have been little recognition of the overlap between T-levels and existing technical qualifications. Not only do the current qualifications called 'Tech Levels' – all of which have been approved by the DfE – have a similar purpose and target audience to T-levels, the groupings of Tech Levels are very similar to the proposed occupational routes for

T-levels (e.g. 'Business and Administration', 'Hair and Beauty'). Even so, Tech Levels are all set to be scrapped in the coming years as T-levels come online, which seems like a great deal of wasted time and effort.

How much visibility is there of the T-level reforms?

A survey published in 2018 found that 62% of parents were unaware of T-levels. When Skills Minister Anne Milton was asked at an Education Select Committee hearing why a parent would want their child to do a Childcare T-level when there was already a well-respected and industry-backed qualification in place, she responded by saying that she would recommend parents "leave it a year" as "all parents are always wary of new qualifications". A similar reaction from parents around the country to the possibility of their child being entered for an untried, untested new qualification would be perfectly understandable. A survey of employers in 2018 did not provide any respite for the Government as 60% of respondents had not heard of T-levels either. This is compounded by the competition that T-levels will face from established routes such as A-levels, BTECs and apprenticeships – which are largely trusted by parents and businesses.

One of the critical points arising from the demise of Diplomas was that teachers wanted to receive promotional materials and supporting documentation for the new qualifications at least 15 months before they started teaching them in order to get themselves and their students up to speed. To avoid this scenario from reoccurring, teachers will require the new T-level specifications and supporting materials by the summer of 2019, yet the Government's current plans show that they won't even award a contract to begin designing the first T-levels until March 2019. The impact of this misaligned timetable on the number of students wishing to take T-levels in September 2020 could be substantial.

Conclusion

The title of this report – *A Qualified Success* – is intended to convey the message that T-levels have the potential to make a valuable contribution to our education system, but this will only be realised if T-levels are conceived, designed and delivered in the wider context of building a high-quality and sustainable technical education route. One of the biggest mistakes made by Diplomas and GNVQs was that it was never clear how they were supposed to fit with, and operate alongside, other qualifications and programmes. Too many elements of the T-level reforms (particularly the distance between them and apprenticeships as well as the proposed licensing model) are likely to cut T-levels adrift from the rest of the 16-19 system. The end result of this will be that T-levels are left vulnerable to any changes in educational or political winds.

The recommendations in this report describe a new path for T-levels that allows the Government to maintain the momentum of the reforms while simultaneously constructing a broader technical education system in which T-levels can play a central role. Far from representing a retreat for T-levels, this report proposes that the Government should in fact be

much bolder and more ambitious for what they can achieve. That is not to say this will be an easy journey, especially when T-levels have got off to such an inauspicious start. Nonetheless, the Sainsbury Review was right to conclude by saying that "it is time now to focus on actually delivering what has been called for so many times in the past: a system of technical education in England that is the match for any in the world." We couldn't agree more.

Recommendations

Part 1: building a simple and stable qualification system for 16- to 19-year-olds

RECOMMENDATION 1: Three qualification pathways should be established to reflect the different purposes and forms of assessment for qualifications at 16-19. These pathways should be called 'Academic' (courses on specific subjects / disciplines assessed by examinations), 'Applied' (broad areas of employment assessed by a mixture of coursework and examinations) and 'Technical' (courses designed to train individuals in a specific trade or profession assessed through different methods).

RECOMMENDATION 2: The full range of 16-19 qualifications should be rationalised so that each subject, discipline or profession only appears in one of the three pathways e.g. Mathematics should be classed as 'Academic', Sport should be classed as 'Applied' and training to be a Plumbing Technician should be classed as 'Technical'.

Part 2: creating strong foundations for 16-19 technical education

RECOMMENDATION 3: T-levels and apprenticeships should be designed as 'parallel' qualifications that consist of the same standard, training curriculum and final assessment for each occupation – based on the model used in the Netherlands and Estonia.

RECOMMENDATION 4: The examination regulator Ofqual should be put in charge of approving and monitoring all final assessments for technical education courses, and no Awarding Organisation should be involved in the technical education system unless they are regulated by Ofqual.

RECOMMENDATION 5: The Institute for Apprenticeships (IfA) should become the voice of technical education for all post 16 learning. The IfA should also be reconstituted so that it becomes a collaborative and representative body for the whole 'skills system'.

RECOMMENDATION 6: The existing 'Trailblazer' groups of employers that design apprenticeship standards and assessment plans should be

merged with the employer panels designing T-level content to create a single 'Technical Education Council' for all 15 occupational routes described in the Sainsbury Review.

Part 3: a new way to design and deliver T-levels

RECOMMENDATION 7: Replace the 'single awarding body' (franchise) model for T-levels with a 'single assessment' model (one assessment, multiple providers) to reduce the level of risk facing the T-level reforms and to help align T-levels and apprenticeships.

RECOMMENDATION 8: Allow AOs who currently offer relevant and comparably-sized qualifications to join a consortium that is given responsibility for creating each new T-level within the first two waves for delivery in September 2020 and September 2021.

Part 4: opening new channels of funding for technical education

RECOMMENDATION 9: Levy-paying employers should be allowed to transfer up to £50,000 of their levy contributions to fund the TEC in their industry sector.

RECOMMENDATION 10: Levy-paying employers should be allowed to draw down £1,500 of their levy contributions to fund each T-level work placement.

Introduction

> *"We will …establish a framework of vocational qualifications that are widely recognised and used, and that are relevant to the needs of the economy; promote equal esteem for academic and vocational qualifications, and clearer and more accessible paths between them; ensure that all young people get better information and guidance about the choices available to them at 16 and as they progress through further education and training; [and] provide opportunities and incentives for young people to reach higher levels of attainment"*

One would be forgiven for thinking that this is a quote from a current government minister regarding the introduction of T-levels – a new suite of vocational qualifications for 16- to 19-year-olds due to be launched in 2020. In fact, it is taken from a White Paper produced by a different Conservative Government – in 1991.[1] Almost thirty years on, many of the same messages are being promoted as a fitting justification for T-levels, which represent the latest in a long line of reforms to vocational qualifications in England.

Those familiar with vocational education have become used to the frequency with which new ideas, qualifications and programmes come and go, stretching back several decades at the very least. To illustrate the point, from 1977 to the publication of the aforementioned White Paper in 1991 a total of £89 billion was spent on introducing 25 training schemes, of which 22 were subsequently cancelled (some after only a year or two in existence).[2] Recent history hasn't fared much better, with 16 major changes to the further education and skills system being enacted since the 2010 general election.[3] In amongst this seemingly endless policy churn, it is easy to forget the importance of constructing and delivering high-quality vocational programmes to learners of all ages, and how difficult this becomes when the qualification landscape is so unstable.

The introduction of T-levels is part of a wider 'skills agenda', which includes the reforms to apprenticeships that began in 2012. The Education Secretary Damian Hinds has been effusive about the possibilities that T-levels might bring, describing them as "a once in a lifetime opportunity to reform technical education in this country so we can rival the world's best performing systems."[4] The prize awaiting any country with a high-performing skills system is indeed considerable. Learners will be able to choose from a range of excellent programmes covering most, if not all, industry sectors that lead to good jobs with progression opportunities. Employers can shape the qualifications and programmes available in their industries, which should help to eliminate 'skills gaps' and deliver more

1. Department for Education and Science, *Education and Training for the 21st Century (Volume One)* (London: Her Majesty's Stationery Office, 1991), 3.
2. Derek Gillard, 'Education in England - Chapter 15 : 1979-1990', Webpage, 2018.
3. Chris Belfield, Christine Farquharson, and Luke Sibieta, *2018 Annual Report on Education Spending in England* (London: Institute for Fiscal Studies, 2018), 37.
4. Department for Education, 'New T Levels Mark a Revolution in Technical Education', Press release, 27 May 2018.

productive workplaces. Society as a whole should reap the benefits of higher employment levels and better wages that stem from education and training programmes feeding directly into the labour market as well as employers of all sizes no longer relying on foreign workers to fill their vacancies. The benefits of high-quality vocational education are therefore substantial. Conversely, the penalty for a poorly-performing system is severe: low-quality courses that do not offer good wages or progression; employers constantly grappling with skills gaps and often relying on foreign labour to fill vacancies; frequent mismatches between what our education system provides and the job opportunities that are available; and, as already mentioned, hundreds of millions of pounds being wasted on qualifications and programmes that only last a matter of years before being swept away.

These gains or losses will only be amplified as Brexit reshapes our labour market. It is likely that low-skill immigration from the EU will decline in the years ahead. This will have two important consequences. First, home-grown talent will need to step into any vacancies created by a fall in immigration levels. In the past employers may have opted to recruit EU workers for particular roles but this option might not be available to them in future. Second, the education and training system will need to be better equipped to provide a sustainable pipeline of UK talent than it has been in recent years. This will put greater pressure on government, employers and training providers to work together and deliver high-quality outcomes for learners.

Politicians are perfectly entitled to identify problems in our education system and seek to address them, but this is rarely as easy as it sounds. It is therefore imperative that every attempt is made to ensure that mistakes made in previous reform programmes are not repeated. Although trying to learn from earlier mistakes does not guarantee future success, such an approach makes any changes more likely to endure. On that basis, this report begins with an exploration of two major initiatives that sought to reshape the world of vocational education in recent decades – GNVQs and Diplomas – with the aim of understanding why neither of them have survived to the present day. After providing a historical perspective, the next step is to understand whether the newly-proposed T-levels have indeed learnt from past mistakes or whether they are heading down the same path as their predecessors. Finally, once T-levels have been analysed in detail, a set of recommendations will be offered that seek to build a stable, rigorous and respected technical education system over the next few years.

The History of Vocational Qualification Reform

This chapter will focus on the two most prominent attempts to introduce a new suite of vocational qualifications over the last 30 years: first, GNVQs and NVQs; and second, Diplomas. Both reforms ultimately failed. Understanding how and why this occurred provides several crucial insights for assessing whether T-levels are likely to succeed or not, which will be discussed in the next chapter.

GNVQs

The 1991 White Paper *Education and Training for the 21st century* from the then Conservative Government outlined their plans to improve the education and training system for 16- to 19-year-olds. Their proposals were designed to "meet the needs and aspirations of young people going into work" as well as offering "a response to the rising demand from employers for more and higher level skills to meet the growing challenge from overseas competitors in world markets".[5] The starting point for the White Paper was that "vocational qualifications in this country have been undervalued and underused".[6] This was to be addressed by the recently-introduced National Vocational Qualifications (NVQs) that would be accredited by the National Council for Vocational Qualifications (NCVQ), itself established in 1986.[7] The new NVQs would be, among other things, "based on up-to-date standards, set by employers, which define the knowledge and skills that people need in the workplace" and "a guarantee of competence to do the job" as they were intended to be specific to each occupation.[8]

In spite of the recent arrival of NVQs, the White Paper noted that "many young people want to keep their career options open [and] want to study for vocational qualifications which prepare them for a range of related occupations but do not limit their choices too early."[9] This led to the NCVQ inviting awarding bodies to create General NVQs (GNVQs), which would "cover broad occupational areas, and offer opportunities to develop the relevant knowledge and understanding, and to gain an appreciation of how to apply them at work".[10] GNVQs would be available at three levels, loosely equivalent to low-grade GCSEs, high-grade GCSEs and A-levels.

The goals set for GNVQs were highly ambitious. They had to "be of equal standing with academic qualifications at the same level", act as "an accepted route to higher level qualifications, including higher education" and simultaneously "be clearly related to the occupationally specific NVQs, so that young people can progress quickly and effectively from one to

5. Department for Education and Science, *Education and Training for the 21st Century (Volume One)*, 2.
6. Ibid., 16.
7. Gillard, 'Education in England - Chapter 15 : 1979-1990'.
8. Department for Education and Science, *Education and Training for the 21st Century (Volume One)*, 16.
9. Ibid., 18.
10. Ibid.

the other" while also being "sufficiently distinctive from occupationally specific NVQs to ensure that there is no confusion between the two".[11] Furthermore, the Government piled pressure on NVQs and GNVQs in their early stages by declaring that they "want academic and vocational qualifications to be held in equal esteem" and that young people "should not be limited by out-of-date distinctions between qualifications".[12] This was not the first time that a politician had expressed a desire for parity of esteem between academic and vocational routes, and it would certainly not be the last.

Given the speed with which they were launched, GNVQs inevitably encountered difficulties. A 'tick-box' approach to competency-based assessments and coursework that lacked rigour, confusing documentation and jargon, excessive paperwork and recording requirements and vague performance criteria were just some of the issues facing teachers and learners.[13] Nevertheless, over 162,000 students enrolled for GNVQs in 1994/95 and Advanced GNVQs (equivalent to A-levels) were being used for entry to higher education courses.[14] There were, however, still two ongoing concerns. First, GNVQs appeared to become more distant from NVQs and were not catering well for those who went on to enter employment directly, which led to a clear consensus that GNVQ would not form a bridge between academic and vocational routes. Second, 'parity of esteem' was evidently not being achieved, and was arguably never a realistic goal, as schools and colleges were using GNVQs to provide for those students whose performance at GCSE was normally well below that of their peers.[15]

Three years after GNVQs were created, a review of the National Curriculum led by Sir Ron Dearing floated the idea of introducing of a high-quality vocational pathway into Key Stage 4 (age 14-16) as part of a broad-based curriculum.[16] In addition, he proposed the development of three 'educational pathways in post-16 education and training':

- "the 'craft' or 'occupational' - equipping young people with particular skills and with knowledge directly related to a craft or occupation through National Vocational Qualifications (NVQs)"
- "the 'vocational' - a midway path between the academic and occupational - leading to General National Vocational Qualifications (GNVQs)"
- "the 'academic', leading to A and AS levels"[17]

In 1996, Ron Dearing followed this report on the National Curriculum with another review, this time of qualifications for 16 to 19-year-olds, which started from the following premise:

> *"The range of qualifications for 16-19 year olds is vast. There are at least 16,000. This reflects the wide range of purposes they are designed to serve, the multiplicity of awarding bodies, and the simultaneous availability of qualifications being phased in while others are phased out. What we have is the product of history. Initiatives have followed one another over time. Each has been designed for its own purpose, with limited concern to provide coherence*

11. Ibid.
12. Ibid., 24.
13. Paul Sharp, 'The Development of the Vocational Curriculum for 16-19 Year Olds in Colleges and Schools - 1979-1995', Webpage, 2002.
14. Ibid.
15. Ibid.
16. Ron Dearing, *The National Curriculum and Its Assessment: Final Report* (London: Her Majesty's Stationery Office, 1994), 19.
17. Ibid.

> *and ready understanding on the part of students, parents and employers, or to provide a framework in which it is possible to combine elements from different pathways, or to move from one pathway to related study in another."*[18]

The review added that "few outside education know more than the name of the General National Vocational Qualification (GNVQ)" and "the National Vocational Qualification (NVQ), which has been available for some nine years, is a familiar term in major industries [but] the complexity of the systems associated with it has been a major barrier to involvement and understanding among small companies."[19] Although it was noted that A-levels countered this trend, largely due to the brand establishing itself over the course of 45 years, Dearing still felt that "the standing of A levels has led to their expansion beyond the purposes for which they were created [and] their further expansion would most probably serve to increase the already too high proportion of disappointed students who find the A level approach is not right for them."[20]

The evidence received by Dearing's review led him to conclude that "it takes about ten years for a qualification to become generally known [as] industry and commerce have too many other pressing demands on their attention for managers, especially line managers, to keep abreast of educational developments."[21] As a result, Dearing asserted that "unless we can bring greater simplicity, everyday English and stability into the system of qualifications, employers will not be helped to make good decisions in recruitment. Their commitment to training will be blunted, and they will tend to play for safety by recruiting on the basis of the qualifications they know best."[22] Despite his desire to create three separate 'pathways' at 16-19, Dearing wanted the review to "make explicit the equal standing of academic, applied and vocational qualifications."[23]

To embed the three pathways that Dearing had trailed in his previous review, he recognised the need "to make explicit the essential purposes and characteristics of each of the three main qualifications pathways."[24] This need was highlighted by the problems at the interface between A-levels and the GNVQ:

> *"Both are designed to be taught in schools and colleges, and many people, prospective employers for instance, may be perplexed when they find that there is an A level in business studies and an Advanced GNVQ in business, an A level in art and an Advanced GNVQ in art and design. and an A level in science and an Advanced GNVQ in science.Without knowing the detail of the courses, it is difficult for people to understand the difference."*[25]

The review also noted the key differences between GNVQs and A-levels regarding their style of learning and assessment, with the former typically being based around projects and coursework and the latter more closely associated with academic study and external examinations. To simplify and clarify the system, Dearing recommended that the three pathways should be defined by the following characteristics to reflect their underlying purpose:[26]

18. Ron Dearing, *Review of Qualifications for 16-19 Year Olds* (Hayes: Her Majesty's Stationery Office, 1996), 11.
19. Ibid.
20. Ibid.
21. Ibid., 5.
22. Ibid., 6.
23. Ibid., 12.
24. Ibid., 14.
25. Ibid.
26. Ibid., 15.

A-level	Applied Education (GNVQ)	Vocational Training (NVQ)
Where the primary purpose is to develop knowledge, understanding and skills associated with a subject or discipline.	Where the primary purpose is to develop and apply knowledge, understanding and skills relevant to broad areas of employment.	Where the primary purpose is to develop and recognise mastery of a trade or profession at the relevant level.

Although Dearing entertained the possibility of students being able to transfer between pathways during their studies, "it would be wrong … to seek to build up common elements [between the qualifications] if this were to undermine the distinctive purposes being served by an A level or a GNVQ."[27]

Dearing's proposed pathways would undoubtedly have helped address some of the problems with complexity and confusion among parents, students and employers. Regrettably, these recommendations were not enacted, and the vocational system became even more complicated with the announcement of Advanced Vocational Certificates of Education (AVCEs) in 2000. AVCEs were intended to deflect criticism of low standards in GNVQs by sitting in between A-levels and GNVQs, as the Government hoped this would ensure greater parity of esteem between vocational and academic qualifications.[28] Unfortunately, AVCEs made little progress in this regard and struggled to convince colleges and employers of their value when they contained so little vocational content and suffered from the same criticisms of GNVQs with regard to their competence-based assessments – leading to many colleges simply abandoning them.[29] GNVQs were also hampered by being constantly redesigned in terms of their assessment, grading and unitised structure, which merely compounded these issues.

In the end, both AVCEs and GNVQs buckled under the weight of such problems and were discontinued by 2007.[30] Their replacement was 'Applied A-levels', which coincidentally was put forward by Dearing's review in 1996 as his proposed new label for GNVQs. Confusingly, the aim of Applied A-levels was to provide a broad background in a vocational area as well as progression routes into higher education, further training or employment[31] – almost exactly what GNVQs were supposed to achieve. They were also assessed in a similar way to GNVQs (mainly coursework) and, like GNVQs, included more general skills development such as presentation skills and time management.[32] Applied A-levels barely exist today and their numbers have plummeted in recent years, with just over 11,000 students achieving either a single or double award in June 2018.[33] It is fair to say they are no longer considered a notable feature of the 16-19 system. NVQs are still available in many subjects and a handful of industry sectors (most notably Construction) continue to use them but the NVQ brand is treated more as a wrapper for qualifications at different levels rather than being a formal qualification in its own right. Despite numerous high-profile attempts to embed GNVQs and NVQs as core parts of our vocational education system over the course of 15 years, they are now

27. Ibid., 17.
28. House of Commons Education and Skills Committee, *14–19 Diplomas: Fifth Report of Session 2006–07 Report*, HC 249 (London: Her Majesty's Stationery Office, 2007), 185.
29. Ibid.
30. City & Guilds, *Sense and Instability: Three Decades of Skills and Employment Policy* (London: City & Guilds Group, 2016), 30.
31. Stephen Wilkins and Ian Walker, 'Applied and Academic A Levels: Is There Really a Need for the Applied Track in UK Further Education?', *Journal of Further and Higher Education* 35, no. 4 (2011): 2.
32. Ibid., 3.
33. Joint Council for Qualifications, 'Applied GCE, Extended Project and AEA Results - Summer 2018', Webpage, 2018.

hardly spoken of in government circles. Politicians may have wanted these qualifications to represent high-quality training programmes for young people that produced parity of esteem with more academic courses, but political will was not enough to save them.

Diplomas

Even before GNVQs and AVCEs had been formally drawn to a close, a new wave of qualifications was already on the way. The final report of the working group on 14-19 reform – known as the 'Tomlinson Review'[34] – was published in October 2004. It proposed a radical shift in both what was taught and the way in which it was delivered. The most eye-catching recommendation in the Tomlinson Review was that all courses at Key Stage 4 (14-16) and 5 (16-19) should comprise two components: 'core learning' (mathematics, literacy and communication, ICT, an extended project and several other skills and attributes) and 'main learning' (focused on a specific area or subject). Moreover, the entire system of qualifications for 14 to 19-year-olds was to be replaced by a system of 'Diplomas', available at four levels – entry, foundation, intermediate and advanced levels – at which the Core and Main Learning would be delivered (see Figure 1).

Figure 1: The new 'Diploma' framework proposed by the Tomlinson Review alongside the existing group of qualifications available in 2004

Diplomas			Existing Qualifications	
Advanced	Core	Main Learning	Level 3	Advanced Extension Award; GCE and VCE AS and A level; level 3 NVQ; equivalent qualifications
Intermediate	Core	Main Learning	Level 2	GCSE grades at A*-C; intermediate GNVQ; level 2 NVQ; equivalent qualifications
Foundation	Core	Main Learning	Level 1	GCSE grades D-G; foundation GNVQ; level 1 NVQ; equivalent qualifications
Entry	Core	Main Learning	Entry	Entry level certificates and other work below level 1

The Review proposed that each pupil would enter the 'Diploma framework' at age 14 at the appropriate level and subsequently progress through the levels over time by completing the relevant Core and Main learning. Within the four levels there would be up to 20 Diploma 'lines' i.e. broad subject categories such as Social Sciences, each of which offered a range of academic and vocational courses designed by providers, Higher Education institutions and employer representatives. The simpler framework offered by these Diplomas was warmly received by the teaching unions and then Secretary of State for Education Charles Clarke, who described the Diploma as a "cogently argued, challenging and compelling vision of the future".[35]

34. Mike Tomlinson, *14-19 Curriculum and Qualifications Reform: Final Report of the Working Group on 14-19 Reform* (London: Working Group on 14-19 Reform, 2005).

35. Charles Clarke, 'Statement by the Education Secretary, Charles Clarke, to Parliament on the Tomlinson Report', *The Guardian*, 18 October 2004.

In addition, he told Parliament that the Diplomas "would establish a single coherent, understood qualifications framework for the first time", "put vocational and academic qualifications on a common footing, again for the first time" and "would promote greater personalisation of the curriculum to meet the needs of individuals and so greater choice for young people."[36]

While the Diplomas seemed to garner support, the proposal that all existing academic and vocational qualifications would be brought within its framework meant that existing qualifications such as GCSEs and A-levels would cease to exist. This was considered highly toxic in political terms with a General Election just months away, resulting in Prime Minister Tony Blair vetoing the plan and insisting that GCSEs and A-levels must stay.[37] Two months later, a cabinet reshuffle saw Charles Clarke replaced as Education Secretary by Ruth Kelly[38] and the momentum behind the sweeping reforms was irretrievably lost.

To accompany the Government's White Paper on 14-19 education and skills in February 2005, Ruth Kelly declared that their plans meant "for the first time we are going to take on and tackle the intellectual snobbery which has relegated vocational education to a second class, second best education".[39] In truth, it represented a major retreat from the original vision for Diplomas. The White Paper confirmed the introduction of new specialised 'Diplomas' covering academic and vocational material in 14 occupational sectors, which would be available at Levels 1 (Foundation), 2 (GCSE) and 3 (A-level). Nevertheless, it was stated in no uncertain terms that the Government would "retain GCSEs and A levels as cornerstones of the new system".[40] Not only were many stakeholders unenthused by this half-hearted compromise, Mike Tomlinson commented that the watered-down plans "may only emphasise the difference between the vocational and the academic rather than bringing them together", adding that "my greatest fear is that vocational will continue to be seen as second best and available and taken by those who 'can't do anything better'."[41]

For many, this dreary compromise represented the worst of both worlds, doing nothing to simplify the system for young people and offering neither quality vocational education nor a convincing academic route. The aims of the Diploma programme were also a cause for concern. When the Education and Skills Select Committee investigated Diplomas in 2007 shortly before their launch, they found that these qualifications were supposed to increase participation levels in post-16 education, provide a sound basis for progression to Higher Education (including developing the attributes that universities frequently say students lack such as independent inquiry), act as a qualification that "genuinely meets the needs of employers" and provide more stretch and challenge "in a way that the current curriculum does not consistently achieve".[42] For a single qualification to meet all these aims was far too optimistic, as GNVQs had already demonstrated. The National Association of Head Teachers told the Select Committee that "there is considerable confusion about their purpose and it is unreasonable to expect the same qualification to address, simultaneously, issues of parity of esteem for vocational and academic

36. Ibid.
37. Andrew Porter, 'Diplomas Set to Replace A-Levels and GCSEs', *The Telegraph*, 24 October 2007.
38. Mike Baker, 'Why Tomlinson Was Turned Down', *BBC News Online*, 26 February 2005.
39. BBC News, 'Diploma Response "Missed Chance"', *BBC News Online*, 23 February 2005.
40. Department for Education and Skills, *14-19 Education and Skills* (Norwich: Her Majesty's Stationery Office, 2005), 6.
41. BBC News, 'Diploma Response "Missed Chance"'.
42. House of Commons Education and Skills Committee, *14–19 Diplomas: Fifth Report of Session 2006–07 Report*, 9.

routes, university discrimination and disaffected young people".[43]

The Select Committee identified yet more confusion over what exactly Diplomas were supposed to be, as "it has not always been clear to what extent the new programmes are intended to be vocational, or applied, or to serve a more general educational purpose." Indeed, the Committee highlighted the fact that government ministers had variously described them as 'specialised vocational Diplomas', 'specialised Diplomas' and 'Diplomas' as the reforms had moved forward.[44] Unsurprisingly, the Committee recommended that "[the Government] must ensure there is a real, shared understanding of the kinds of learning and teaching that Diplomas will involve among those responsible for their design, development and delivery" and that "consensus on this should have been established at the outset and the failure to do this is a matter of deep concern to us."[45] The state of confusion was inadvertently summed up by Alan Johnson, then Secretary of State for Education, telling the Select Committee that "the whole point of these Diplomas is that they are vocational education. They do not lead to a vocational qualification."[46]

Serious issues were also aired to the Committee about the speed with which the Government planned to roll out Diplomas, as "most contributors …raised concerns about the feasibility and desirability of the timetables and deadlines which were currently being pursued."[47] The Edge Foundation told the Committee that "the current time-scales are unrealistic—some would say dishonest", the Institution of Engineering and Technology argued that "insufficient time has been set aside either for the creation of new course content, or to take and consider input and experiences from the wider group of stakeholders" and the National Association of Head Teachers said the timescales were "inappropriately and unrealistically short".[48] However, the Qualifications and Curriculum Authority (the government agency in charge of the Diploma programme) rejected calls to delay the start of the programme beyond 2008, arguing that such a move risked curtailing the enthusiasm of those who were keen to start delivering the Diplomas.[49] The Committee's conclusion was that it was essential Diplomas proceeded at "a slow and controlled rate, with sufficient time for development and assessment [because] too often in the past, initiatives have been rolled out too quickly, with serious negative effects on quality."[50] They also drew attention to the "failure [of the Government] to appreciate the sheer scale and complexity of the challenge in hand" in terms of designing and developing these new qualifications."[51]

The first Diploma courses began on schedule in September 2008. 17 subjects would eventually have been available, but the individual subject lines were to be introduced in 'waves' over four years (see Figure 2). The list of 17 subjects included the first 14 announced in 2005 plus three additional programmes in 'Humanities', 'Languages' and 'Science' (which would potentially have allowed the Government to roll GCSEs and A-levels into the Diploma framework at a later date, should the political winds have changed).

43. Ibid.
44. Ibid., 13.
45. Ibid., 16.
46. Ibid., 15.
47. Ibid., 17.
48. Ibid.
49. Ibid., 18.
50. Ibid., 20.
51. Ibid., 32.

Figure 2: The original timetable for introducing Diploma subject lines

September 2008	September 2009	September 2010	September 2011
Construction and the Built Environment	Environmental and Land-based Studies	Travel and Tourism	Humanities
Creative and Media	Business, Administration and Finance	Public Services	Languages
Engineering	Manufacturing and Product Design	Sport and Active Leisure	Science
Information Technology	Hospitality	Retail Business	
Society, Health and Development	Hair and Beauty Studies		

Every Diploma was to be broken into three components:

- Principal Learning – subject-related learning focused on applying knowledge and skills relevant to an industry sector
- Generic Learning – made up of 'functional skills' (English, Mathematics and ICT), 'personal, learning and thinking skills' (e.g. creative thinking, teamwork), a minimum of 10 days of work experience or part-time work and a project
- Additional and Specialist Learning – enabling pupils to specialise through taking additional qualifications and complementary courses

Each Diploma subject line would then be available at three different 'levels':

- Foundation Diploma – Level 1 (between Key Stage 3 and 4)
- Higher Diploma – Level 2 (GCSE)
- Advanced Diploma – Level 3 (A-level)

There was also a 'Progression Diploma', which was the same as the Advanced Diploma apart from the exclusion of two components, suggesting that it was intended to act as a 'fall-back' option for those who failed to complete the Advanced Diploma.

These plans arguably bore some resemblance to the Tomlinson proposal for 'core learning' and 'main learning' being offered at different levels, albeit with several additional elements inserted. That said, the Tomlinson Review had aimed to make the education system more transparent and easier to understand. The Diplomas achieved precisely the opposite. By 2011, there would be 17 subjects available, each of which would have four levels (versions) – giving a total of 68 separate Diplomas. In addition, at each of the four levels within the 17 subjects, the Principal Learning and Additional/

Specialist Learning components had their own syllabus. For example, the 'Creative and Media' Diploma included elements of around 20 employment fields including fashion and footwear design, advertising, drama, film, TV, radio, computer games, creative writing, woodwork, metalwork and ceramics. In giving evidence to the Children, Schools and Families Select Committee in 2008, Greg Watson from OCR described the Diplomas as "the most complicated qualification that I have ever seen". It could have got even worse, as an 'Extended' Diploma was to be made available in 2011 across all 17 subjects – bringing the total number of Diplomas to 119.

There was already a wide range of work-related qualifications to choose from before the Diploma programme was introduced. At Level 3 (A-level standard), there was now considerable duplication between BTECs, NVQs, Applied A-levels and Advanced Diplomas, which brought little or no benefit to learners and employers. Like GNVQs before them, there were also numerous problems with the proposed approach to assessing and grading Diplomas, particularly after the decision to have different letter grades available at the three different levels. During their investigation of Diplomas, the Select Committee was told by Schools Minister Jim Knight that there was "no timetable for the phasing out of existing qualifications" and he envisaged a situation whereby existing qualifications would "wither on the vine, as the Diplomas win the argument really."[52] The Committee were not impressed by the lack of a clear strategy on this matter:

> *"The question remains as to whether more use could and should have been made of existing 'tried and tested' qualifications such as BTECs at the outset. What appears to have happened is that a 'blank slate' approach has been adopted, with the promise that convergence between the Diplomas and other awards would occur at a later stage. While we appreciate that the aim was to create something new and radical, this nevertheless seems wasteful to us and makes it likely that old lessons will have to be learned again."*[53]

Because of this uncertain landscape, universities gave Diplomas a lukewarm reception. A year before they were first taught, over 60% of universities said that they did not see Diplomas as a 'suitable alternative' to A-Levels.[54] Many universities merely stated that 'applications will be considered on their individual merits'. The influential Russell Group of research-intensive universities tacitly backed Diplomas but only those studied at Advanced level, and they were "concerned to ensure that the Diploma sufficiently equips candidates with the skills and knowledge they need to flourish on our courses".[55] The response from employers was equally tepid. As early as 2006, Ruth Kelly had accepted that the 10 days of work experience may not be directly related to the students' Diploma subject after the QCA announced that they were "not confident" that employers and schools could find sufficient placements in the required fields.[56] The question of whether local employers would be able to provide the volume of work experience required in the Diploma programme across all 17 subjects nationwide was simply ignored by the Government.

An official evaluation of the preparations for delivering Diplomas

52. Ibid., 26.
53. Ibid.
54. BBC News, 'Universities Have Diploma Doubts', *BBC News Online*, 27 July 2007.
55. BBC News, 'More Universities Back Diplomas', *BBC News Online*, 21 May 2008.
56. BBC News, 'Problem over Diploma Work Stints', *BBC News Online*, 22 February 2006.

(which was only published after Diplomas had been launched) showed that the marketing of the new qualifications among young people was clearly inadequate. Over 40% of pupils surveyed in Year 9 (age 14) and Year 11 (age 16) who were not planning to study the Diplomas said that they didn't know enough about them just months before the national roll-out took place.[57] The survey found that "young people preferred to take other, more traditional courses that they knew would be accepted by [higher education institutions]" and "many learners …were concerned that Diplomas 'aren't very useful because universities aren't going to take them'."[58] The student survey also "revealed that many [pupils] had a very limited (and sometimes inaccurate) understanding of what Diplomas would involve. Furthermore, a minority reported that they had 'never been told' anything about Diplomas."[59] In addition, young people had "some concerns that 'since it's a new subject, the teachers wouldn't know what they were doing,' or that the Diplomas would be discontinued if there was a change of government, meaning that the Diploma 'would be a useless qualification then'."[60]

In hindsight, low awareness among students was almost guaranteed as the evaluation survey found that nationally produced promotional materials were received by teaching staff in September 2007, just 12 months before the Diplomas commenced. Staff reported that "they would have been welcomed in the previous summer term, in order to enable [them] to have time before the new term to familiarise themselves fully with the materials and gain an understanding of the Diplomas themselves".[61] In short, staff needed to receive promotional materials and course details at least 15 months before Diplomas started. The result of this sluggish distribution of promotional material was that "many staff did not have a good awareness and understanding of Diplomas, and some were apprehensive about guiding young people to embark on this new qualification that they did not understand themselves fully."[62]

In an unusually candid admission, Alan Johnson had warned shortly before the Diplomas were launched that they "could go horribly wrong" during his time as Secretary of State for Education. His prediction turned out to be rather prescient as the demand for the new Diplomas in September 2008 was extremely low. After Jim Knight predicted that the take-up would be 50,000 and Jon Coles, a senior civil servant, predicted take-up "in the region of 160,000",[63] just 11,490 pupils across the country signed up to the first phase of the Diplomas[64] and only 1,416 students were studying the Advanced Diploma – equivalent to A-Levels.[65] It was no surprise when, shortly after the 2010 general election, the new Education Secretary Michael Gove announced that the three 'academic' Diplomas would be scrapped.[66] The final curtain fell in 2013 when most major exam boards announced that they would no longer offer the Diploma after it emerged just 15,000 students had completed it in the first three years of the programme.[67]

Despite the Labour Government investing over £320 million to develop Diplomas, they became merely another footnote in the history of vocational qualification reforms just five years after their launch. The next chapter in this report will ask whether T-levels are likely to fare any better.

57. National Foundation for Educational Research, *National Evaluation of Diplomas: Preparation for 2008 Delivery (Research Report DCSF-RW079)* (London: Department for Children, Schools and Families, 2009), 94.
58. Ibid., 96.
59. Ibid.
60. Ibid.
61. Ibid., 108.
62. Ibid.
63. BBC News, 'Diploma Takeup Lower than Hoped', *BBC News Online*, 21 May 2008.
64. BBC News, 'Only 12,000 Have Started the Diplomas', *BBC News Online*, 13 October 2008.
65. David Turner, 'Only 1 in 6 Take Top Diploma Level', *Financial Times*, 6 January 2009.
66. Rachel Williams, 'Primary Curriculum and Academic Diplomas to Be Axed', 7 June 2010.
67. Graeme Paton, 'Labour's £300m Diploma Qualifications "a Complete Failure"', *The Telegraph*, 19 November 2011.

The Current State of the T-Level Reforms

Despite being separated by almost two decades and being proposed by two entirely different governments, GNVQs and Diplomas eventually suffered the same fate. Crucially, the parallels between the two qualifications extend far beyond their final outcome. The previous chapter showed that the mistakes made during their design and implementation are remarkably similar:

- **A rushed introduction:** GNVQs and Diplomas were hurried through the design stage and rolled out at a frenetic pace. This meant that there was little time to test and pilot new elements of the programme, even though some were markedly different from previous qualifications. Both sets of qualifications were taught for the first time around two years after they were announced, which left barely any room for error or for improving the quality of education and training relative to existing qualifications.
- **Overly-ambitious goals:** for a single qualification to be responsible for helping students into both Higher Education and technical occupations as well as challenging the most able learners is not a realistic goal, yet GNVQs and Diplomas were lumbered with all these burdens. To compound this, the two qualification reforms were tasked with delivering 'parity of esteem' between academic and vocational learning, without any explanation of what this meant, how it would be measured or whether it was achievable or even desirable.
- **Insufficient clarity for stakeholders over their purpose or links to other pathways:** it is vital that any new qualification or pathway is built into the wider education and training system rather than being treated as an isolated venture. The relationship between GNVQs, A-levels and NVQs was never satisfactorily explored by the DfE, while the question of which qualifications Diplomas were supposed to replace or fit alongside was a point of considerable contention from the moment they were announced.
- **Significant overlap with other qualifications:** because their purpose and place in the qualification landscape was not properly considered before they were rolled out, GNVQs and Diplomas ended up treading on the toes of huge numbers of existing qualifications that often appeared to provide the same content and style of training as the new qualifications. Furthermore, there was

little thought given to how and when existing qualifications were supposed to be replaced by these new programmes.

- **Lack of visibility:** for any new qualification to survive, let alone thrive, it must be clearly understood and valued by all the key stakeholders: students, parents, teachers and employers. GNVQs and Diplomas failed to convince these groups that they were worthy of their time, energy and commitment. This left both qualifications in an untenable position in the years after their launch.

After introducing 'T-levels' and assessing who is likely to study them, this chapter will investigate whether this new qualification pathway is making, or is likely to make, the same mistakes seen in previous attempts to reform vocational qualifications or whether it has instead been placed on a path to success.

What are T-levels?

In November 2015, the Secretaries of State for Education and for Business, Innovation and Skills established an 'independent panel on technical education' to be chaired by Lord Sainsbury. The panel's report (the 'Sainsbury Review'), published in July 2016, contained several well-rehearsed concerns about vocational education in this country. It bemoaned the fact that our system "is over-complex and fails to provide the skills most needed for the 21st century", adding that the UK is falling further behind our international competitors in terms of technical education and economic productivity.[68] The Sainsbury Review declared that:

> *"We need to offer everyone the chance of a lifetime of sustained employment and the opportunity to progress to the highest skills levels. The current system fails on this count as well. Currently over 13,000 qualifications are available for 16-18 year olds, yet these often hold little value for either individuals or employers, although that may not be obvious until too late. At higher levels, too, technical education qualifications have too often become divorced from the occupations they should be preparing individuals for because there have been no, or only weak, requirements that they meet such needs."*[69]

Leaving aside the obvious similarities between the Sainsbury Review's perspective and that described in the 1991 White Paper discussed in the previous chapter, the Review's recommendations were intended to bring about a "fundamental shift" that would "systematically reform technical education for the long term".[70] These included:

- The creation of two distinct pathways from 16-19: 'academic' (including A-levels and Applied General qualifications) and 'technical' (including college-based courses and employment-based training i.e. an apprenticeship)
- A common framework of 15 technical education 'routes' that encompasses all employment-based and college-based technical education at levels 2 to 5[71]

68. David Sainsbury, *Report of the Independent Panel on Technical Education* (London: Department for Education and Department for Business, Innovation and Skills, 2016), 8.

69. Ibid.

70. Ibid.

71. The 15 routes are: Agriculture, Environmental and Animal Care; Business and Administrative; Catering and Hospitality; Childcare and Education; Construction; Creative and Design; Digital; Engineering and Manufacturing; Hair and Beauty; Health and Science; Legal, Finance and Accounting; Protective Services; Sales, Marketing and Procurement; Social Care; Transport and Logistics.

- A single set of employer-designed 'standards', defined by panels of professionals in each sector and covering both apprenticeships and college-based provision, that would describe the knowledge, skills and behaviours required to work in specific occupations
- Every college-based route should begin with a 2-year programme suitable for 16 to 18-year-olds that should start with a 'common core' which applies to all individuals studying that route and is aligned to apprenticeships, after which individuals should specialise to prepare for entry into an occupation (or set of occupations)
- Every 16- to 18-year-old student following a 2-year college-based programme should be entitled to a high-quality, structured work placement, and successful completion of this placement should be a requirement for completing the programme
- At levels 2 and 3, any technical education qualification should be offered and awarded by a single body or consortium under a fixed-period licence following an open competition
- At levels 4 and 5, a register should be created for technical education qualifications that meet the standards set by the panels of professionals, and only those qualifications appearing on this register should be eligible for public subsidy
- Short, flexible 'bridging provision' should be developed to enable individuals to move between the academic and technical options and to support adults returning to study
- A 'transition year' should be offered to individuals who are not ready to access a technical education route at age 16 to help them to prepare for further study or employment[72]

The phrase 'T-level' was not mentioned anywhere in the Sainsbury Review and is in fact a label given by the media to the 2-year college-based programme described in the Review, but it wasn't long before the Government adopted the label themselves. In the subsequent consultation in November 2017, it was explained that T-levels would consist of five components:

- An approved technical qualification
- A work placement
- Maths, English and digital requirements
- Any other occupation-specific requirements / qualifications
- Any further employability, enrichment and pastoral provision

The Government's formal response to the Sainsbury Review (the 'Post-16 Skills Plan'), published alongside it in July 2016, stated that "we accept and will implement all of the Sainsbury panel's proposals, unequivocally where that is possible within current budget constraints."[73] The Government also added a cautionary note to their response:

> *"What is needed now is serious resolve to see this reform plan through: delivering for the long term to secure lasting change. This means learning from*

72. Sainsbury, *Report of the Independent Panel on Technical Education*, 8–15.

73. Department for Education and Department for Business, Innovation and Skills, *Post-16 Skills Plan* (London: Department for Education and Department for Business, Innovation and Skills, 2016), 8.

> *the mistakes of the past in this area. Too often, governments have changed their plans before these could take root, disrupting implementation and undermining the commitment of employers, colleges and training providers. This time must be different. . . . We are determined to be able to look back at 2016 as the point at which we put our system of technical education on the road to becoming truly world-class."*[74]

The rest of this chapter will assess whether the Sainsbury Review has lived up to expectations.

Who will study T-levels?

The DfE has been adamant throughout the T-level reforms that these new qualifications will be "a high quality, technical alternative to A levels".[75] Students support this message too as "they want T Levels to be as well respected as A levels"[76] according to the DfE's response to their T-level consultation. While these ambitions are reasonable, the reality of the 16-19 education system poses considerable challenges for establishing this new set of qualifications.

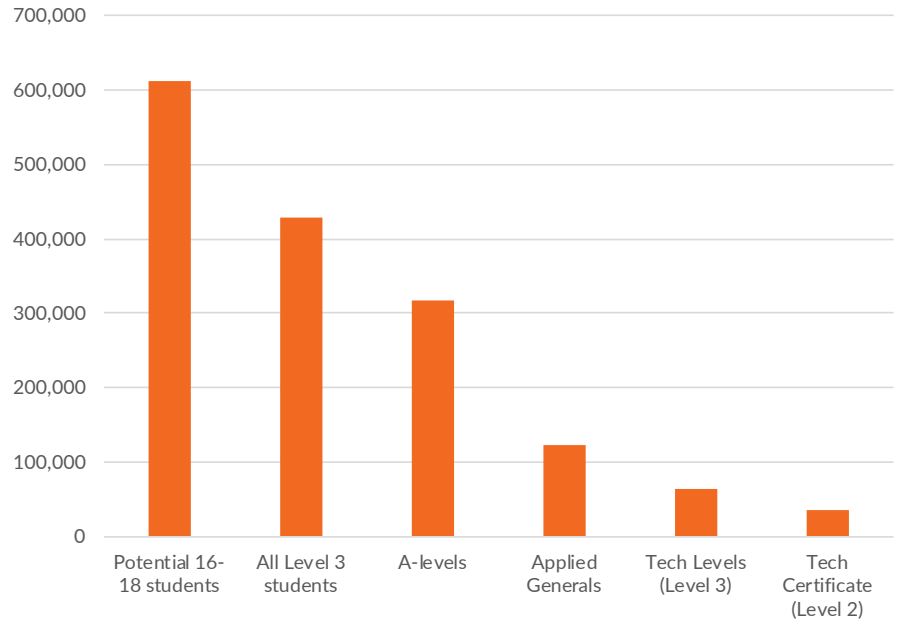
First and foremost, the way that students are funded at 16-19 means that the DfE are only able to exert a small degree of influence over subject choices. As a general rule, schools and colleges receive £4,000 per learner per year and they must then use this funding to build a suitable package of qualifications (academic or technical) for each learner.[77] This means that it will be up to schools and colleges to respond to learner demand for T-levels, and if this demand does not materialise then providers are under no obligation to provide these courses.

As shown in Figure 3, of the 429,000 students who completed any Level 3 qualification in 2016/17, only 64,453 were enrolled on an existing Level 3 technical qualification ('Tech Level')[78] – and just 42,000 were taking a Tech Level with no other qualification alongside it.[79]

When such a small number of students will be spread over 15 T-level routes in future, covering huge numbers of occupations across thousands of schools and colleges, the issue of viability becomes a genuine concern. In addition, not all 16-18 students are even studying at Level 3. 20% of 16-year-olds enrolled in full-time education in the year after their GCSEs are studying at Level 2 and another 7% are studying at Level 1 or below.[80] Colleges have reported that they would need an intake of 18 to 20 students to make a course financially sustainable,[81] which may prove too difficult – particularly in the first wave of T-levels. Indeed, one college principal told the Education Select Committee in October 2018 that she would be 'surprised' if as much as 10% of her students took a T-level and that "I think it would be less than that to start with",[82] and this small cohort will be split across the three T-level pathways being trialled in 2020. There is nothing wrong in principle with starting from a small cohort and expanding numbers over subsequent years. The risk, though, is that the early cohorts are so small that they do not lead to a sustainable set of courses.

74. Ibid., 43.
75. Department for Education, *Implementation of T Level Programmes: Government Consultation Response* (London: Department for Education, 2018), 5.
76. Ibid., 11.
77. Department for Education, '16 to 19 Funding: How It Works', Webpage, 2018.
78. Department for Education, *Revised A Level and Other 16-18 Results in England 2016/2017 (SFR 03/2018)* (London: Department for Education, 2018), 5.
79. Ibid., 7.
80. Department for Education, *Participation in Education, Training and Employment by 16-18 Year Olds in England: End 2017 - Table 4a* (London: Department for Education, 2018).
81. Ewart Keep, 'What Are the Biggest Problems with T-Levels?', *FE Week*, 15 May 2018.
82. House of Commons Education Committee, 'Oral Evidence: School and College Funding', Webpage, 10 October 2018.

Figure 3: Participation of 16- to 18-year-olds studying towards different qualifications during the 2016/17 academic year



Another problem stems from the fact that if the DfE want T-levels to be seen as equivalent to A-levels, they must overcome a major historical hurdle. As the Sainsbury Review noted, technical education in England has long-suffered from a 'lack of prestige'[83] compared to A-levels, which the DfE consider to be "world-class" academic qualifications.[84] To address this imbalance, T-levels will need to be viewed as aspirational qualifications that subsequently lead to respected roles in both education and industry. Even so, this will be largely beyond the DfE's control because, as the Government has stated, "we believe that providers are best placed to decide on whether to admit a student onto a level 3 programme, so we will not impose a minimum entry requirement [for T-levels]."[85] Individual schools and colleges may seek to impose a high bar for the number of (or grades achieved in) GCSE qualifications required to start a T-level, but this will not be compulsory. Many schools and colleges put strict entry requirements in place before students can begin A-levels. It remains to be seen whether providers feel obliged to follow suit for T-levels, but if T-levels fail to attract learners with strong GCSE grades then it will be difficult for them to build a reputation as a prestigious option for young people.

The DfE has not openly engaged with the question of whether T-levels are better suited to schools or colleges. In May 2018, the DfE named the 54 providers who had been approved to teach the first wave of T-Levels – Construction (Design, Surveying and Planning), Digital (Digital Production, Design and Development) and Education & Childcare – from September 2020.[86] It recently emerged that in almost half of these chosen providers, technical education currently forms less than a fifth of their qualification mixture and four of the selected schools offer no technical provision at all.[87] This could present a challenge in terms of delivery

83. Sainsbury, *Report of the Independent Panel on Technical Education*, 26.
84. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 5.
85. Ibid., 15.
86. Department for Education, 'New T Levels Mark a Revolution in Technical Education'.
87. George Ryan, 'First T-Level Providers Offer No Technical Education', *Times Educational Supplement*, 25 September 2018.

timescales and the quality of teaching for students, although the DfE say that they are working closely with providers to ensure the rollout remains on schedule. Not having suitably qualified staff in place will inevitably reduce the quality and standing of T-levels, yet the DfE's current plans do not appear to have prioritised this area.

To illustrate the fragility of the provider base for T-levels, three schools were removed from the list of providers in October 2018 – one of which was an automatic decision following a downgraded rating from Ofsted, but the other two simply decided not to take part anymore.[88] The headteacher of one of the schools that chose to withdraw said they had "come to the conclusion that we wish to consolidate our provision and expertise in the new A-levels at this point in time."[89] Although one additional college was added to the list at the same time as the three schools were removed, this episode highlights the inability of the DfE to control the actions of providers, and that any chosen provider can withdraw at any point in between now and September 2020 if they feel that delivering T-levels is no longer worthwhile.

Are T-levels being introduced at the right speed?

The Post-16 Skills Plan included a timetable for rolling out the full set of reforms that the Government had now taken on board. The Plan said that their timetable worked on the basis that "while we are committed to taking forward the reforms quickly, and in particular establishing all 15 technical education routes as soon as possible, we want to recognise that certain lead-in times are required for reform on this scale."[90] To achieve this, a small number of 'pathfinder' routes would be established that could start developing standards for first delivery in September 2019, with additional routes becoming available in phases between 2020 and 2022.[91] This was followed by the announcement in the 2017 Spring Budget of a funding injection that would eventually rise to £500 million a year to cover the additional taught hours and industry placement requirements for T-levels.[92]

A clear timetable and a major funding increase appeared to put T-levels in a strong starting position, but it did not take long for the timetable to unravel. In July 2017, it transpired that the first T-levels would be delayed until September 2020 after several large awarding bodies had branded the timescale "impossible".[93] In early 2018, the full roll-out of T-levels was also delayed until September 2023 after some respondents to the Government's consultation on T-levels, including the Confederation of British Industry (CBI), had "raised concerns about the capacity of the system to respond to this pace of roll-out."[94] Despite these delays, the Government has tried to maintain the momentum of the reforms. £20 million will be invested to upskill the FE workforce and there is also a 'Capacity and Delivery Fund' that offers colleges and training providers nearly £60 million to "help them build capacity to deliver high quality industry placements over the coming years".[95] What's more, £38 million is now being made available to the first providers of T-levels to make sure pupils have access to the necessary equipment and facilities.[96]

88. Pippa Allen-Kinross, 'Three Schools Removed from T-Levels 2020 Delivery but One College Added', *FE Week*, 17 October 2018.
89. Ibid.
90. Department for Education and Department for Business, Innovation and Skills, *Post-16 Skills Plan*, 42.
91. Ibid.
92. HM Treasury, *Spring Budget 2017* (London: Her Majesty's Stationery Office, 2017), 41.
93. Billy Camden, 'Minister Announces T-Levels Delay', *FE Week*, 20 July 2017.
94. Pippa Allen-Kinross, 'T-Level Full Roll-out Delayed until 2023, DfE Confirms', *FE Week*, 27 May 2018.
95. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 6.
96. Department for Education, 'New Education and Skills Measures Announced', Press release, 2 October 2018.

The biggest implementation challenge facing T-levels is the provision of compulsory work placements. The modelling carried out by the Sainsbury Review suggested that up to 250,000 17-year-olds could require work placements each year.[97] As if generating that quantity of opportunities was not enough of an obstacle, the DfE said in May 2018 that the work placements would need to meet several criteria:

- the student must have the opportunity to develop relevant and up-to-date technical skills and specialist knowledge related to their field of study at the appropriate level (as defined by their technical qualification) in an external workplace environment, for 45-60 days (min. 7 hours a day, max. 37.5 hours a week)
- the student must have the opportunity to apply their theoretical knowledge in a workplace environment
- the student has experienced a real-life job and has the opportunity to develop behaviours and attitudes expected in the workplace[98]

To identify, arrange and subsequently deliver 250,000 placements that meet these criteria will be an enormous undertaking. In response to this, the DfE launched a work placement pilot in September 2017 to test different models and approaches across 21 providers, and they also began allocating resources from the Capacity and Delivery Fund in April 2018 to start building providers' capacity and infrastructure.[99] A survey by the City and Guilds awarding body in June 2018 found that almost three-quarters of employers were willing to play a greater part in helping students apply their learning in workplace settings (providing they receive appropriate support from government). Nonetheless, just under three quarters of respondents said the average duration of existing work placements / work experience is two weeks or less and only 8% of employers currently offer placements of the duration required for T-levels.[100]

Research commissioned by the DfE painted a similarly worrying picture. The main problem cited by employers when providing work placements was the impact of the supervision and training necessary to manage it. Many employers are already "reaching a 'saturation point', where taking on more learners would require a level of staff time beyond that which they could reasonably spare" including "additional time for the upfront administrative requirements as well as quality checking and oversight to avoid costly mistakes."[101] Among employers that were not currently offering placements (often small organisations) "there was a reluctance to divert resources away from employees' usual work in order to train and supervise a young learner". This is mostly driven by "a perceived inability to offer any 'meaningful opportunities', i.e. beyond basic or administrative tasks, without diverting significant resources to training and supervision."[102] The research even found that "some employers considered that the nature of their work or the working environment made it either inappropriate or legally impossible to support young people",[103] which could have serious implications for several of the 15 T-level routes in more safety-critical sectors.

97. Sainsbury, *Report of the Independent Panel on Technical Education*, 53.
98. Department for Education, *Implementation of T Level Programmes: Government Consultation* (London: Department for Education, 2017), 19.
99. Department for Education, *Post-16 Technical Education Reforms: T Level Action Plan* (London: Department for Education, 2017), 14.
100. City & Guilds and AELP, *T Level Work Placements Research* (London: City & Guilds and AELP, 2018), 7–8.
101. Rowan Foster et al., *Employer Engagement and Capacity to Support T Level Industry Placements* (London: IFF Research and The Learning and Work Institute, 2018), 6.
102. Ibid., 7.
103. Ibid.

Employers generally welcomed the length of the proposed T-level placements of 45 days as well as the flexibility over how to structure this (e.g. block, day release or a combination of both). They were also reassured that the placement would be related to the qualification being studied.[104] However, although many employers indicated a willingness to offer placements, they could not commit to generating any placements until they had received further clarification and information on:

- Content of the course and the objectives of the placement
- Structure and timing of the placement
- The role of the learning provider
- How T Level qualifications fit with other FE and HE qualifications
- Guidelines around paying learners[105]

The researchers also found that "without this information [some employers] could not even state their level of willingness to engage with T Level industry placements", while a small group of employers "explicitly stated that they would be unwilling to offer T Level industry placements" – typically because they could not see the benefit of T-levels relative to other qualifications (e.g. apprenticeships) or they did not believe that they would have the capacity to offer the placements.[106]

For employers to be unable or unwilling to provide work placements for T-level students until these clarifications have been received is both understandable and troubling, particularly as some of the above information will not be available until a matter of months before the first T-levels are supposed to be taught in September 2020. The DfE will no doubt prioritise getting information to employers in the months running up to the launch of T-levels, although employers will still need a considerable lead time to plan a high-quality placement. This brings into question whether the first cohort of T-level students will have enough work placements waiting for them when they embark on their course. The logistical issues inherent in providing such a large volume of placements for as-yet-unqualified students should also not be underestimated. These issues include safeguarding, IT access and security, providing equipment both in and out of the office, pastoral care and support and assisting with travel to and from work.

To further complicate matters, employers reported that in order to understand whether a T-level placement might suit their organisation, "they need to understand how [a T-level] fits with and compares to options such as A-levels, apprenticeships, NVQs and university degrees." In addition, "where the industry is one in which vocational qualifications are already well-established, the value of a T Level, compared to an apprenticeship or a qualification with a more significant work placement component, is questioned […] based on a perception that a primarily classroom-based qualification is a poor substitute for work-based learning."[107] As will be explained later in this chapter, the relationship between T-levels and existing qualifications is far from clear at this point, which is a notable risk for the reforms as the survey of employers showed that "we are

104. Ibid.
105. Ibid., 8.
106. Ibid.
107. Ibid., 58.

likely to see trade-offs between employers' willingness to offer T Level industry placements and their ability to continue with existing vocational placements, traineeships and apprenticeships."[108]

With many questions still unanswered regarding work placements, coupled with the highly ambitious timescales for producing brand new and untested qualifications by 2020, Jonathan Slater, the Permanent Secretary at the DfE, publicly wrote to Education Secretary Damian Hinds in May 2018 to say that he had concluded "as things stand today, it will clearly be very challenging to ensure that the first three T-levels are ready to be taught from 2020 and beyond to a consistently high standard".[109] Instead, he recommended that the start date for T-levels be deferred to 2021. Should the Education Secretary wish to stick with his original timetable of implementing from 2020 onwards, Jonathan Slater requested a written 'ministerial direction', which are most frequently used when departmental accounting officers (in this case, Jonathan Slater) think that a planned policy is unfeasible or represents poor value for money. In response to this, Damian Hinds said that he recognised the reasons why a ministerial direction had been requested but added that "none of the advice [he had received] has indicated that teaching from 2020 cannot be achieved."[110]

For Damian Hinds to have been asked for a ministerial direction – the first one issued at the DfE for at least 30 years[111] – suggests that civil servants have a very different view from the Education Secretary on the likely success of the T-level reforms given their current trajectory. Sir Gerry Berragan, the chief executive of the Institute for Apprenticeships (IfA), also appears to have a different view from ministers. He told a conference in March 2018 that "the last thing we should do is start the first three [T-levels] on the wrong footing and give them a bad reputation", adding that "I think the timeline for delivery of the initial three pathways is worryingly tight".[112]

To get the first three T-levels ready would be a considerable achievement considering the published timescales. The awarding organisations (AOs) who successfully bid to design and deliver these T-levels will be notified in early 2019.[113] From this point, the successful AO will only have 11 months to develop the entire T-level qualification (specification and assessment) as well as get it approved by the IfA and accredited by the examination regulator Ofqual.[114] Assuming that this happens on time, March 2020 to August 2020 has then been defined as the 'operational period', during which providers will be 'upskilled' to support their delivery of the new qualification.[115] The notion that this upskilling will only take a few months is a serious concern given the intended size and complexity of T-levels. More broadly, there is no room for even a small delay at any point in this chain of events before delivery is supposed to commence in September 2020. This goes some way to explaining the 'ministerial direction' issued by the DfE.

108. Ibid.

109. Richard Johnstone, 'DfE Perm Sec Gets Ministerial Direction to Press Ahead with Technical Education Reforms', *Civil Service World*, 25 May 2018.

110. Ibid.

111. Institute for Government, 'Ministerial Directions', Webpage, 29 May 2018.

112. Billy Camden, 'IfA Boss Admits Fears for Tight T-Levels Timescale', *FE Week*, 2 March 2018.

113. Department for Education, 'T Levels Move Another Step Closer as Competition Launches', Press release, 3 September 2018.

114. Ofqual, *VTQ Stakeholder Group - July 2018* (Coventry: Ofqual, 2018).

115. Ibid.

Are the ambitions for T-levels appropriate?

Where will learners go after completing a T-level?

Like GNVQs and Diplomas before them, T-levels are expected to deliver a far-reaching set of outcomes. The Sainsbury Review declared that the main purpose of T-levelsis to develop the technical knowledge and skills required to enter skilled employment. However, T-levels are also supposed to allow progression to a higher / degree apprenticeship and studying higher-level technical qualifications. Moreover, having noted that "it would be disingenuous to pretend that any student choosing to start on one option at age 16 will be able to move seamlessly to the other option at any time of their choosing", the Review felt that "we should not accept an education system which shuts off the potential to access higher education and training of either [the academic or technical] option."[116] To solve this dilemma, it was seen as "essential that clearly signposted 'bridging provision' exists so that individuals can move between academic and technical education options."[117] This 'bridging provision' would be made up of "a suite of practically-focused bridging courses that equip individuals who have followed the academic option with the practical skills developed through the technical education option" and "should include part-time and short courses which might, for example, be delivered in the evenings or at summer schools."[118]

At the time of writing, over two-and-a-half years since the Sainsbury Review was published, it is still not clear whether this bridging provision will exist when T-levels commence. The Review recommended that the Government 'incentivise' the development of this new provision, but without the content of T-level qualifications being available it is not possible to judge whether such bridging provision will even be feasible, let alone delivered on time. The DfE's response to the T-level consultation said that "once T-level content is finalised, we will work with HE providers to identify where bridging provision might be needed".[119] This falls well short of guaranteeing that AOs will have the capacity and desire to produce such provision, or that universities will accept the bridging provision as suitable preparation for their degrees.

The overall response from universities to T-levels has thus far been lukewarm. In early 2018, Imperial College London stated that "we do not believe that T-levels provide a suitable preparation for students" while University College London commented that "at present, UCL does not accept the new T-level qualification for entry to its undergraduate programmes."[120] Some universities such as Glasgow, Leeds and Sheffield have indicated that they would accept T-levels in principle but would make decisions on a case-by-case basis. Unsurprisingly, most universities have not made up their minds over whether to accept T-levels and blame their reticence on the lack of detail available. This was exemplified by the University of Oxford saying that "we are watching with interest the development and take-up of the T-levels, and will base our judgement on them once we have more evidence on how the qualifications are used in schools."[121] The university admissions

116. Sainsbury, *Report of the Independent Panel on Technical Education*, 29.

117. Ibid.

118. Ibid., 30.

119. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 17.

120. Jonathan Owen, 'T Levels Rejected by Some of Britain's Top Universities', *Times Educational Supplement*, 9 February 2018.

121. Ibid.

body UCAS has also acknowledged that "it's too early to say how T-levels will be considered when it comes to university admissions."[122]

Licensing T-level qualifications

The Sainsbury Review declared that our market-based system of qualification "is inherently unfit for purpose", chiefly because "a 'race to the bottom' can develop in which AOs compete to offer less demanding qualifications which are easier to teach and easier to pass, driving down standards and rewarding poor quality."[123] The Review also complained that there were over 12,000 qualifications eligible for public funding for 16- to 18-year olds (excluding A-levels) including 3,000 qualifications at Level 3. The overriding concern was that this proliferation has several negative consequences. These included the difficulty of ensuring that rigour and quality are maintained, employers and colleges struggling to identify qualifications that are suitable for them and teachers and students finding it hard to navigate the system.[124] Their solution was for the government to adopt a 'licensing approach' in which "any technical education qualification at levels 2 and 3 should be offered and awarded by a single body or consortium, under a licence covering a fixed period of time following an open competition."[125] The Review felt that this would have many advantages over the current system, particularly in terms of simplicity and clarity.

This is not the first time in recent years that the Government has been attracted to the notion of licensing qualifications as a franchise to a single organisation. In the early years of Michael Gove's tenure as Education Secretary, the DfE considered a similar plan for GCSEs. When the Education Select Committee investigated these plans in 2012, they reported similar advantages to those being put forward for licensing T-levels with some additions such as a franchised system making it "easier for learned bodies, higher education and employers to engage and [it] would also avoid the duplication of syllabuses and dilution of examiner expertise that exist in the current system."[126] Nevertheless, the Committee's final report stated that "there are some very significant issues relating to franchising that would need to be taken into account."[127] This was highlighted by the Committee's list of disadvantages related to a licensing / franchise approach for GCSEs:

- Cost, disruption and risks incurred by moving to new system
- Threat to provision of small entry subjects unless formally agreed
- Potential problems with continuity after lifetime of contract
- Incentive to maintain quality and innovate would need to be built into terms of contract
- Issue of comparability of standards over time
- Issue of comparability between subjects (and exam boards
- Examiner expertise would be concentrated in one place and lost elsewhere, potentially problematic when franchise is up for renewal and if contracts change
- Heightened risks when contracts change

122. Ibid.

123. Sainsbury, *Report of the Independent Panel on Technical Education*, 41.

124. Ibid., 42.

125. Ibid.

126. House of Commons Education Committee, *The Administration of Examinations for 15–19 Year Olds in England: First Report of Session 2012–13*, vol. 1, HC 141-I (London: Her Majesty's Stationery Office, 2012), 34.

127. Ibid.

- Significant investment needed from government/Ofqual to get contract right
- Bidding process would be significant resource burden for exam boards
- Costs may increase for schools as exam boards would build in risk premium to cope with policy changes over lifetime of a contract
- Could be financially challenging for exam boards if profitable, large entry subjects are lost.[128]

The same issues are just as pertinent for T-levels. The Committee added that "the impact on unsuccessful bidders should also be considered",[129] which is even more relevant for T-levels as many small- and medium-sized AOs only offer qualifications in a handful of sectors (just one or two in some cases). This means that their failure to win a license for T-levels could have a devastating effect on their organisation, whereas the breadth of subject coverage by the main AOs for GCSEs would have protected them to some extent from a failure to win the license(s). Michael Gove acknowledged that his plans could be subject to legal challenge by disappointed bidders precisely because it could threaten the financial viability of some AOs.[130]

In a subsequent report on examination reform the following year, the Committee revisited the issue of franchising and delivered an even stronger verdict:

> *"In our report last year, [...we] expressed concern about the possible long-term impact and the 'serious downsides' of a franchised system. The Government must demonstrate that it has taken sufficient account of the likely unintended consequences of franchising, such as an increase in pricing, and of the complexities of the tendering process, in view of the explicit warnings from the regulator and assessment experts about the risks associated with market reform."* [131]

Their conclusion was equally robust:

> *"We are concerned that attempting to reform qualifications, increase their difficulty, and change the way exams are administered all at the same time and to a very tight timetable may jeopardise the quality of the reforms, as well as threaten the stability of the wider exam system."* [132]

In the end, Michael Gove was forced to abandon his plans because of, as he put it, "significant risks in trying to both strengthen qualifications and to end competition in large parts of the exams market".[133]

Historical concerns over the risks of franchising are now resurfacing during the development of T-levels. Research commissioned by the DfE in 2017 on the vocational qualifications market supported some of the assertions from the Sainsbury Review about the potential benefits of reform, such as addressing the "misaligned incentives, potentially leading to a 'race to the bottom' in terms of rigour".[134] However, the research identified numerous advantages of the existing system that would be lost under a licensing model. For example, they found that "competition can be an effective tool in driving improvements in customer support (our

128. Ibid., 1:23–24.

129. Ibid., 1:34.

130. House of Commons Education Committee, *From GCSEs to EBCs: The Government's Proposals for Reform: Eighth Report of Session 2012–13*, HC 808-I (London: Her Majesty's Stationery Office, 2013), 16.

131. Ibid.

132. Ibid., 28.

133. Peter Walker, 'Scrapping GCSEs Was "a Bridge Too Far"', *The Guardian*, 7 February 2013.

134. Frontier Economics, *Assessing the Vocational Qualifications Market in England* (London: Department for Education, 2017), 13.

stakeholders reported that this is a service that is high value for them, and that this is a key way in which AOs compete) so a reduction in competition …could potentially have negative effects on customer service."[135] More worryingly, the research identified "a risk of system failure associated with limiting access to the market to a single AO (or consortia) [because] if the AO (or AO consortium) fails there may be no alternative AO to step in".[136] A handful of solutions were put forward in the research, but they tended to be superficial and in some cases wildly optimistic e.g. introducing a requirement that AOs who have won a contract for one T-level route are forced to maintain spare capacity in case they are called upon to step in to deliver assessment services should an AO fail in another route.

The process of selecting an AO for the first wave of three T-levels in September 2020 has not gone smoothly. A legal challenge was launched in July 2018 by the Federation of Awarding Bodies (FAB) against the plans for a licensing model, as they felt that the DfE was "simply not willing to listen to a chorus of concerns about its T-level implementation plans".[137] This included the DfE demanding that any AO awarded a license for T-levels would have to give up the intellectual property of any materials they use to deliver the contract as well as AOs being banned from using any of their own branding on the qualifications. Although the legal challenge was subsequently dropped after the DfE watered down some of their demands,[138] the decision by civil servants not to listen to the legitimate concerns of stakeholders and industry experts regarding the licensing model has inevitably increased the risk that the predicted 'system failure' may come to pass sooner rather than later.

The DfE's apparent insistence on retaining their plans for licensing AOs to design and deliver T-levels is made even more peculiar when one considers their justification for doing so. When the legal challenge from the FAB was first submitted, Damian Hinds pushed back strongly by claiming that the licensing of AOs was "key to upholding quality" and "it is the right thing to do."[139] This does not sit comfortably alongside the Education Secretary's recent comments about the existence of multiple AOs for academic qualifications:

> *"…if you look internationally, it is more common to not have the same sort of landscape that we do. On the other hand, we probably have more leading education services suppliers than other countries, so perhaps it's not surprising that we also have this variety and diversity in examination boards. And obviously all of those organisations bring something to the system. […] I am happy with our system, yes."* [140]

It is difficult to maintain these views on the benefits of having multiple AOs awarding the same qualifications while simultaneously declaring that the only way to uphold quality is to only have a single AO for each qualification. In addition, there are no clear plans to license AOs to deliver vocational qualifications at lower and higher levels, leaving the single AO model being proposed for T-levels as an isolated case in both the academic and vocational routes.

135. Ibid., 19.

136. Ibid.

137. Billy Camden, 'Awarding Organisations Launch T-Level Legal Challenge in Pre-Action Letter to DfE', *FE Week*, 18 July 2018.

138. Billy Camden, 'T-Level Legal Challenge Dropped after DfE Offer to "Re-Set the Relationship" with Awarding Bodies', *FE Week*, 2 August 2018.

139. Billy Camden, 'Hinds Hits Back at Awarding Organisations' "Deeply Disappointing" T-Levels Legal Challenge', *FE Week*, 19 July 2018.

140. Freddie Whittaker, 'Hinds: "I'm Happy with System of Multiple Exam Boards"', *Schools Week*, 13 October 2018.

Is there clarity for stakeholders over the purpose of T-levels and their links to other pathways?

The relationship between T-levels and apprenticeships

In their response to the T-level consultation in May 2018, the DfE insisted that T-levels would have a clearer purpose than the ill-fated Diplomas. For instance, they claimed that the reason "diplomas were not widely taken up was that they lacked a clear purpose, attempting to chart a 'middle course' between vocational and academic qualifications" whereas T-levels are "part of a new, distinct technical offer, based on a common set of standards with apprenticeships.[141] They also noted that "Diplomas were programmes that were broadly relevant to whole sectors" whereas "T Levels explicitly set out to equip young people with the knowledge and skills required to enter skilled employment". [142] What's more, they believed that T-levels would succeed where Diplomas failed because the latter "did not recognise that apprenticeships and taught technical education qualifications needed to be seen as 'two sides of the same coin'."[143]

A recent OECD report on apprenticeships in England described three ways in which apprenticeships can relate to other vocational qualifications:

1 Apprenticeships <u>or</u> T-levels

There is a clear division of labour between apprenticeships and other forms of training, so that the competencies for each occupation are acquired **either** through an apprenticeship **or** through some other more appropriate form of training.

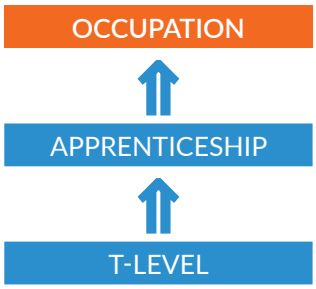
2 Apprenticeships <u>alongside</u> T-levels

There are alternative (parallel) routes to the same occupation, allowing apprenticeships to offer one way of acquiring the competences while other routes are also possible including school- or college-based training. This model is often associated with a competence-based final assessment, permitting different means of preparing for that assessment. For example, in the Netherlands and Estonia there is both a school-based and an apprenticeship route to every upper secondary vocational qualification.

141. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 12.
142. Ibid.
143. Ibid.

3 Apprenticeships after T-levels

This is, in effect, a sequential programme. For example, in Norway apprentices spend the first two years of their programme in school-based upper secondary education with a relatively broad curriculum, followed normally by two years with an employer, gaining the work-based experience that will allow them to qualify as an apprentice.[144]



Having described the three options, the OECD report commented that "the logic of current reforms in England implies the 'alternative routes' model [option 2], but uncertainty remains".[145] This uncertainty is caused by the fact that the proposed model for T-levels and apprenticeships fails to fully match *any* of the above options and appears to combine (deliberately or otherwise) elements of all three of them:

1 Apprenticeships or T-levels

Most of the 15 occupational routes proposed for T-levels will be available as either an apprenticeship or a T-level. However, the Sainsbury Review unexpectedly declared that four of the 15 routes "will primarily be delivered through apprenticeships",[146] meaning that no classroom-based T-level would be available. No accompanying explanation was provided at the time and, when later asked to provide an explanation, the DfE claimed that "the public interest in withholding the information requested outweighs the public interest in disclosing it."[147] By essentially forcing some routes to use apprenticeships while other routes retain both options, the technical education system will immediately look imbalanced and these decisions will be very hard to unwind in future years should a government wish to expand college-based provision.

2 Apprenticeships alongside T-levels

The Sainsbury Review recommended that the DfE introduce "a single, common framework of standards [that] should cover both apprenticeships and college-based provision [and] these standards must be designed to deliver the knowledge, skills and behaviours required to perform successfully in specific occupations."[148] Although the use of the same 'standards' is a useful first step in aligning the two modes of technical education, the modes are entirely misaligned in two other crucial areas.

First, completing an apprenticeship at Level 3 is supposed to lead to 'occupational competence' (the ability to *do* a skilled job) whereas it quickly transpired that T-levels will only lead to 'threshold competence' (the ability

144. Małgorzata Kuczera and Simon Field, *Apprenticeship in England* (Paris: OECD, 2018), 80.

145. Ibid.

146. Sainsbury, *Report of the Independent Panel on Technical Education*, 35.

147. George Ryan, 'Government Refuses to Say Why Some T Levels Classed as Apprenticeship-Only', *Times Educational Supplement*, 27 April 2018.

148. Sainsbury, *Report of the Independent Panel on Technical Education*, 17.

to *start* a skilled job).[149] As a result, respondents to the DfE's consultation on T-levels "raised numerous questions …about how 'threshold competence' would be measured in practice [and] the extent to which employers would realistically value this over competence attained through a level 3 apprenticeship."[150] The DfE insisted that threshold competence "is as close to full occupational competence as can be expected from students studying a classroom-based qualification" while at the same time accepting that they must make sure "employers can be confident that a student completing a T Level would be at least as valuable for industry as a learner completing a level 3 apprenticeship".[151] This muddled thinking cannot obscure the fact that T-levels will not equip young people with the skills, knowledge and behaviour they need to succeed in an occupation.

Second, to fully align T-levels with apprenticeships there must be the same final assessment for both modes of training as well as using the same standard. In the absence of a single assessment for both T-levels and apprenticeships, the two technical education routes will inevitably lead to students acquiring different levels of skill and knowledge – further distorting the technical education route. The Sainsbury Review warned that "without a focus on alignment, the two modes of technical education will diverge, leading to a fragmented system, which is never seen in the leading international examples."[152] This is precisely where the system is heading at present.

3 Apprenticeships <u>after</u> T-levels

The Sainsbury Review envisaged that each T-level "should begin with a 'common core' which applies to all individuals studying that route and is aligned to apprenticeships [and] after the common core, individuals should specialise to prepare for entry into an occupation or set of occupations."[153] In line with the OECD report, the Review cited Norway as a template for this because they provide "a broad education in one of eight technical education routes before individuals specialise to prepare for entry into a particular profession, where up to a further 3 years' study might be required."[154]

A workplace-based apprenticeship would seem entirely appropriate as the next step after a T-level, as seen in Norway, yet this was explicitly ruled out by the Sainsbury Review as it stated that after completing a T-level a learner would only be allowed to start an apprenticeship at Level 4 (equivalent to the first year of university) instead of at Level 3 (equivalent to a T-level). This is despite the aforementioned problems with 'threshold competence' versus 'occupational competence', as finishing a classroom-based course with minimal exposure to the workplace is likely to lead to a shortfall in the skills acquired by learners. The DfE's consultation response agreed that "in some routes students may need additional training to reach full occupational competence, beyond the usual induction to the workplace", yet went on to merely add that "once T Level content is finalised we will consider with the [IfA] the best way to do this."[155]

To further confuse the situation, the Sainsbury Review said that after completing the core content for a T-level, "some individuals may decide

149. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 24.
150. Ibid., 50.
151. Ibid., 56.
152. Sainsbury, *Report of the Independent Panel on Technical Education*, 38.
153. Ibid., 18.
154. Ibid., 46.
155. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 35.

to apply for an apprenticeship [at Level 3] in their chosen field", which meant that "the core content should therefore be closely aligned with apprenticeship standards to enable smooth transition between the two modes."[156] In short, it will be perfectly acceptable to start an apprenticeship at Level 3 if a student leaves a T-level halfway through but it would not be acceptable to move onto a Level 3 apprenticeship at the end of a T-level. No justification has been provided for this, even though completing a T-level would still leave a learner well short of occupational competence in some, if not all, occupational routes. This puts T-levels a long way off the 'sequential' model found in Norway despite the Sainsbury Review's assertions, not least because the Norwegian equivalent of T-levels must be completed before embarking on an apprenticeship whereas 16-year-olds in England are entitled to move straight into apprenticeships.

The OECD's report was adamant that "apprenticeships need to be very closely aligned with related vocational qualifications [and] a close alignment between apprenticeship standards and any associated technical qualifications reflects the logic and the spirit of the Sainsbury review, and best international practice."[157] Regrettably, their analysis showed that such alignment is a distant prospect in England. They added:

> *"…there are real risks of fragmentation, for example if there emerge slightly different qualifications, alongside apprenticeship, offering a confusing landscape of competing possibilities for the student, and indeed the employer. It is precisely this landscape of confusion, which, by common consent has been one of the weakest points in the English vocational training system, which current reforms are designed to tackle."*[158]

Much to the alarm of stakeholders, T-levels have effectively been set up as competitors to apprenticeships. This will almost certainly make T-levels less appealing to students, parents and employers as the new qualifications will struggle for credibility when sat alongside an established training route such as apprenticeships. The Sainsbury Review wanted there to be "flexibility for individuals to move between the two modes of learning within the technical education option"[159] without any explanation for how this might work. Such ambitions are well-intentioned, but they do not seem realistic. Likewise, the DfE's goal of T-levels and apprenticeships being seen as 'two sides of the same coin' looks increasingly unattainable without a dramatic shift in the direction of the reforms.

The relationship between T-levels and Applied General qualifications

Alongside the announcement of 'Tech Levels' in 2013 came the introduction of 'Applied General' (AG) qualifications, which were described as "vocational qualifications not directly linked to an occupation but providing broader study of a vocational area [and] will need the explicit backing of 3 universities".[160] By September 2014, 90 AG qualifications had been approved for use.[161] The Sainsbury Review raised immediate questions over the future of AG qualifications, not least because it proposed a 16-19

156. Sainsbury, *Report of the Independent Panel on Technical Education*, 46.

157. Kuczera and Field, *Apprenticeship in England*, 81.

158. Ibid.

159. Sainsbury, *Report of the Independent Panel on Technical Education*, 30.

160. Department for Education, 'New "Tech Levels" to Raise the Quality of Vocational Qualifications', Press release, 4 July 2013.

161. Department for Education, *Vocational Qualifications for 16 to 19 Year Olds* (London: Department for Education, 2015), 7.

system made up solely of 'academic' and 'technical' qualifications. That said, the Review said that AG qualifications could be considered as part of the 'academic' route but such decisions were outside its remit.[162]

The Post-16 Skills Plan said that the DfE would "review the contribution of [AG] qualifications to preparing students for success in higher education [and] what part they can play in the reformed system".[163] The DfE's T-level consultation response in 2018 said only that "we recognise that there may be a need to fund some other qualifications in addition to A levels and T levels but are keen to ensure that the system is as simple as possible" and reiterated that their review "will include considering the role of Applied General Qualifications."[164] The DfE's response did at least recognise that "some respondents were concerned about removing qualifications that were well established and supported by employers, such as Applied General Qualifications, which they felt were successful in supporting student progression."[165] As shown earlier in Figure 3, even though there are more than double the number of approved Tech Levels compared to AGs, almost twice as many students completed AGs than completed Tech Levels in 2017.[166]

At the time of writing, the review of AG qualifications has not been published and its likely outcome remains uncertain, although the DfE has said that "decisions resulting from this review will be implemented in line with the timeline for the introduction of T Levels".[167]

The relationship between T-levels and qualifications at higher and lower levels

Aside from the lack of clarity about how T-levels relate to other qualifications at Level 3, the process by which students may move onto T-levels to begin with has thrown up another set of issues. Some students will elect to start a T-level after achieving good results in their GCSEs. For those who do not achieve well, the Sainsbury Review recommended that "individuals who are not ready to access a technical education route aged 16 …should be offered a 'transition year' to help them prepare for further study or employment."[168]

The objective of the transition year was to "equip individuals with the knowledge, skills and behaviours they need to progress" but, beyond the expectation that English and maths would be offered to all those who did not pass the GCSE exam, the content of the transition year would vary "to reflect both the individual's needs and their longer term aspirations".[169] According to the Review, this might include work experience, developing digital skills, study skills and soft skills e.g. teambuilding and pastoral support. The Review admitted that this type of content "is not so different to the study programmes that many lower attaining students follow now" although they stated their desire to "see a much sharper focus on progression, on work experience or placements, and on basic skills and behaviours rather than low-value qualifications."[170]

The Review suggested that the DfE "commissions additional work into the design and content of a transition year", adding that "such work

162. Sainsbury, *Report of the Independent Panel on Technical Education*, 26.

163. Department for Education and Department for Business, Innovation and Skills, *Post-16 Skills Plan*, 20.

164. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 10.

165. Ibid. 22.

166. Department for Education, *Revised A Level and Other 16-18 Results in England 2016/2017 (SFR 03/2018).*

167. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 22.

168. Sainsbury, *Report of the Independent Panel on Technical Education*, 58.

169. Ibid.

170. Ibid.

should be undertaken in good time to ensure the new transition year is available to students alongside first teaching of the technical education routes."[171] Nonetheless, as with the bridging provision discussed earlier in this chapter, there is still no information available on what this transition year might involve. In their T-level consultation response the DfE said that they will "gather evidence on existing good practice of similar 'transition' programmes […and] we will also consider how the transition offer could best be targeted."[172] This leaves two important questions unresolved. First, what can a transition year offer that the existing set of qualifications and programmes – such as Traineeships and Apprenticeships – cannot provide? Second, is it realistic to expect a student who has not achieved highly in their GCSEs to complete a transition year and then leap straight up to a demanding two-year T-level qualification at Level 3?

Moreover, T-levels are not linked to the existing suite of 90 approved vocational qualifications at Levels 1 and 2 that provide 14 to 16-year-olds with applied knowledge and practical skills – known as 'Technical Awards'. These qualifications are loosely grouped together in the same categories as 'Tech Levels' (see next section), not the 15 occupational routes that will underpin T-levels. The DfE said in their T-level consultation response that they intend to review the qualifications available at Level 2 and below to establish which are suitable for their new qualification landscape that includes T-levels and the transition year.[173] When all these disparate offers are combined, the pre-Level 3 landscape will soon include Technical Awards (Level 1 and 2), Technical Certificates (Level 2), Traineeships, Apprenticeships and the new transition year. The intersecting goals and target audiences of these various qualifications and programmes will result in the vocational system becoming increasingly difficult for students and providers to understand and subsequently navigate.

Not only is the link between pre-Level 3 provision and T-levels unclear, the DfE is also planning to overhaul vocational qualifications at Levels 4 and 5 as well. The Sainsbury Review stated that high-quality courses at this level had been "under-provided and poorly articulated" and they also thought that "there is real value in simplifying the current landscape".[174] On that basis, the Review recommended that the IfA "maintains a register of approved technical education qualifications at levels 4 and 5 that meet the standards set by its panels of professionals [and] only those qualifications appearing on this register should be eligible for public subsidy."[175] They also called on the DfE "to ensure clear progression routes develop from levels 4 and 5 to degree apprenticeships and other higher education at levels 6 and 7."[176] In December 2018, Damian Hinds announced that the DfE is planning to build a 'new generation' of higher technical qualifications at levels 4 and 5 for T-level students to progress onto from 2022 onwards, which will be an alternative to degrees and apprenticeships for mostly 18-year-olds.[177] These will be developed using a combination of existing level 4 and 5 technical qualifications as well as the creation of some new qualifications. While combining existing and new qualifications may appear sensible, it raises even more questions

171. Ibid., 60.

172. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 18.

173. Ibid.

174. Sainsbury, *Report of the Independent Panel on Technical Education*, 11.

175. Ibid., 12.

176. Ibid.

177. Billy Camden, 'DfE to Consult on Level 4 and 5 T-Levels for Introduction from 2022', *FE Week*, 6 December 2018.

about what is happening with T-levels at Level 3 (see next section).

Introducing T-levels at Level 4 and 5 will also reignite questions about whether they are suitable for adults, including at Level 3, as T-levels are intended to supersede large numbers of existing vocational qualifications – many of which are aimed at older learners. The Sainsbury Review in 2016 only dedicated one of its 102 pages to adult learners. It noted that "any system of education and training must work for adults as well as young people" and that "well-signposted, flexible bridging provision, for example, is needed by all."[178] Although the Review suggested that adults might be able to use T-levels in future, the Government's T-level consultation response in 2018 did not confirm their plans for adults. Instead, the response merely commented that "19 to 23 learners who do not yet have a level 3 qualification could benefit from the same T Level programme as 16 to 19 year-olds" whereas "for learners who are over 24, we will take into account wider reviews to technical education …as we consider any specific adaptations that will improve accessibility."[179] This adds more uncertainty into the vocational system because it is unclear which qualifications might be available for learners in years to come and also which learners may have access to them.

Do T-levels overlap with other qualifications?

The Sainsbury Review stated in its opening pages that when attempting to reform technical education, "the first step is framing and setting up technical education in the right way within the wider education and training system […as] it needs to fit coherently with other forms of provision."[180] While the Review recognised that "technical education will involve some knowledge of an academic discipline, in the same way that the academic option will provide knowledge which is useful in the workplace", it nevertheless believed that "a distinction [between academic and technical education] can usefully be drawn."[181] These sentiments echo what the Dearing Review had said in 1996 about the need "to make explicit the essential purposes and characteristics" of different qualification pathways to prevent confusion among students and parents.[182]

If T-levels are to succeed, a clearly defined purpose combined with clear dividing lines between all the various qualification pathways will be crucial. At present, the lines separating qualification pathways are too blurred. Figure 4 contains examples of qualifications from the two existing 'academic' pathways that sit outside the remit of T-levels – A-levels and AGs – along with a set of proposed occupations within the technical education reforms (T-levels and apprenticeships) in future years. The scale of duplication across these three main pathways is plainly apparent.

It is hard to comprehend how a 15- or 16-year-old is supposed to navigate an education system that contains so many overlapping options. Even if T-levels manage to simplify the training courses available through the technical education route, this will not solve the widespread issues caused by a lack of differentiation in the purpose and characteristics of many other qualifications.

178. Sainsbury, *Report of the Independent Panel on Technical Education*, 30.

179. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 18.

180. Sainsbury, *Report of the Independent Panel on Technical Education*, 8.

181. Ibid.

182. Dearing, *Review of Qualifications for 16-19 Year Olds*, 14.

Figure 4: Examples of qualifications available across different pathways

Accounting	A-level Applied General Technical Education	Accounting Financial Studies Assistant Accountant
Art and Design	A-level A-level A-level Applied General Technical Education Technical Education	Art and Design Design & technology (Fashion & Textiles) Design & technology (Product Design) Art and Design Design Technician Textile Craftperson Fashion/Textile Specialist
Business	A-level Applied General Applied General Applied General Technical Education Technical Education Technical Education	Business Business Applied Business Enterprise and Entrepreneurship Business Administrator Retail Assistant Marketing Assistant
Computer Science	A-level Applied General Applied General Technical Education Technical Education Technical Education	Computer Science Computing Information Technology IT Support and Services Technician Software Development Technician Digital Business Technician
Environment	A-level Applied General Technical Education Technical Education Technical Education Technical Education	Environmental Science Environmental Science Agricultural Operative/Technician Arboriculture and Forestry Operative Horticulture Operative/Technician Conservation and Countryside Worker
Law	A-level Applied General Technical Education	Law Applied Law Paralegal
Music technology	A-level Applied General Technical Education	Music Technology Music Technology Media, Broadcast and Production Technician
Physical education	A-level Applied General Applied General Applied General Technical Education	Physical education Sport Sport and Exercise Science Sports Studies Exercise, Fitness and Health Assistant
Science	A-levels Applied General Applied General Applied General Technical Education Technical Education	Biology / Chemistry / Physics Applied Science Medical Science Laboratory Skills Science Technician Healthcare Science Assistant

In addition to the considerable overlap between T-levels and academic qualifications, there appears to have been little recognition of the overlap between T-levels and existing technical qualifications. The Sainsbury Review in 2016 claimed that there were 3,000 vocational qualifications

available for 16 to 19-year-olds at Level 3.[183] However, this ignored the important changes made to performance tables that excluded the vast majority of these courses (even if they were technically still funded by the DfE). In 2013, then Skills Minister Matthew Hancock announced the introduction of 'Tech Levels', which were intended to "help people into apprenticeships and jobs".[184] Tech Levels were essentially a wrapper for any vocational qualification that met a demanding set of criteria, including the course being in a recognised occupation and being of sufficient size. Most importantly, a Tech Level had to have public (written) support from professional bodies or at least five employers. This meant that rather than civil servants attempting to sift through thousands of individual specifications, they could simply remove any qualifications from the 2016 performance tables that did not meet their new benchmarks. The end result was that, as of December 2015 (shortly before the Sainsbury Review was published) there were just 183 approved Tech Levels[185] – a far cry from the lamented figure of 3,000 vocational qualifications cited in the Review.

At the time of writing, there are just 218 Tech Levels approved by the DfE.[186] Seeing as these are employer-endorsed vocational qualifications suitable for 16- to 19-year-olds, it seems strange for the T-level reforms to not even recognise their existence. Not only do Tech Levels have a similar purpose and target audience to the proposed T-levels, the groupings of Tech Levels are very similar to the proposed occupational routes for T-levels as part of the Sainsbury Review (see Figure 5).

Successful as they were at filtering out low-quality qualifications, Tech Levels did not resolve every issue. For example, there are five different Tech Levels for 'Equine Management'. This is due to the variation in the Guided Learning Hours (GLH) that each qualification represents, ranging from the smallest version at 360 GLH (equivalent to one A-level) up to 1080 GLH (equivalent to three A-levels).[187] This pattern is found in other Tech Levels such as childcare, construction and the built environment and hair and beauty, where multiple Tech Levels of different sizes are available. For comparison, the required planned hours for T-levels will be 900 to 1400 hours,[188] demonstrating how much content is expected to be delivered. This duplication of content is not helpful for learners or employers, and greater simplicity could be achieved relatively easily and swiftly.

How much visibility is there of the T-level reforms?

The technicalities involved in designing a brand new suite of qualifications from scratch are considerable. Even once this process is complete, ensuring that the new qualifications are widely known and understood will always present another significant hurdle. Ultimately, all the main stakeholder groups in the 16-19 system – students, parents, teachers and employers – must be convinced that a novel qualification is worth their time and effort.

183. Sainsbury, *Report of the Independent Panel on Technical Education*, 41.

184. Department for Education, 'New "Tech Levels" to Raise the Quality of Vocational Qualifications'.

185. Department for Education, '2018 Performance Tables: Technical and Vocational Qualifications', Webpage, 18 December 2015.

186. Department for Education, '2019 Performance Tables: Technical and Vocational Qualifications', Webpage, 4 September 2017.

187. Department for Education, 'Guidance: Tech Levels', Webpage, 4 September 2017.

188. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 68.

Figure 5: The groups of existing 'Tech Levels' compared to the occupation routes in the Sainsbury Review

Tech Level groupings (announced in 2013)	Sainsbury Review occupational routes (announced in 2016)
Accounting, law and personal finance	Agriculture, Environmental and Animal Care
Agriculture, horticulture and animal care	Business and Administrative
Arts, media and publishing	Catering and Hospitality
Business and administration	Childcare and Education
Child development and well-being	Construction
Construction, planning and the built environment	Creative and Design
Engineering, manufacturing and transportation operations	Digital
Hair and beauty	Engineering and Manufacturing
Health and social care	Hair and Beauty
Hospitality and catering	Health and Science
ICT	Legal, Finance and Accounting
Sport	Protective Services
Travel and tourism	Sales, Marketing and Procurement
	Social Care
	Transport and Logistics

A survey published in September 2018 found that only 7% of parents of 11- to 18-year-olds knew a lot about T-levels and 62% were unaware they existed.[189] Although many parents agreed in principle with the concept of T-levels, these figures suggest that a lack of visibility remains a significant issue. When Skills Minister Anne Milton was asked at an Education Select Committee hearing why a parent would want their child to do a childcare T-level when there was already a well-respected and industry-backed qualification in place, her response was surprisingly candid:

> *"The job of persuading parents to do any new qualification is always quite tough and we know that not huge numbers will do it in the first instance because… I mean, I'm a parent of four children. If somebody said to me, 'Your children could do this new qualification,' I'd say, 'Leave it a year.' You know, instinctively, that is what parents will do."*[190]

The Minister added that "I think all parents are always wary of new qualifications" and "it will take a while to persuade both young people and their parents that these are a cut above."[191] The Minister later claimed that her comments had been taken out of context. In truth, her reaction as a parent to the possibility of her child being entered for an untried, untested new qualification was perfectly understandable.

A survey of employers in August 2018 did not provide any respite for the Government. 60% of respondents had not heard of T-levels and the

189. Jo Faragher, 'Two-Thirds of Parents Have Not Heard of T-Levels', *Personnel Today*, 5 September 2018.

190. George Ryan, 'Milton: "Leave It a Year" before Taking T Levels', *Times Educational Supplement*, 17 July 2018.

191. Ibid.

survey highlighted "a potentially fatal mismatch" between the amount of work experience that T-Level students would need to complete their qualification and what UK employers currently feel able to offer.[192] For a new qualification that is just 18 months away from commencing delivery to have attracted so little attention from employers does not bode well. This is compounded by the competition that T-levels will face against established routes such as A-levels, BTECs and apprenticeships – which are largely trusted by parents and businesses.

The development of the Diplomas provides a useful illustration of what can happen if students and teachers are similarly unconvinced about new qualifications. The desire among many young people to study "more traditional courses that they knew would be accepted" by universities was a powerful headwind facing Diplomas,[193] as was the fact that "many [pupils] had a very limited (and sometimes inaccurate) understanding of what Diplomas would involve."[194] Some young people also demonstrated an astonishing level of prescience by reporting concerns that Diplomas would be discontinued if there was a change of government, meaning that the Diploma 'would be a useless qualification then'."[195] All of these issues are highly pertinent for T-levels.

What's more, teachers commented that they wanted to have received promotional materials and supporting documentation for the Diplomas at least 15 months before they started teaching the new qualification. Because these materials did not materialise in time, "many staff did not have a good awareness and understanding of Diplomas, and some were apprehensive about guiding young people to embark on this new qualification that they did not understand themselves fully."[196] Again, this is an important consideration when assessing the likelihood of T-levels succeeding because it would mean that teachers will require the new specifications and supporting materials by the summer of 2019, yet the Government's current plans show that they won't even award a contract to begin designing the first wave of T-levels until March 2019. This strongly suggests that, yet again, teachers will not have the information they need to advise students about T-levels when they are making their subject choices for Year 12. The impact of this misaligned timetable on the number of students wishing to take T-levels in September 2020 could be substantial.

Even if the visibility among stakeholder groups improves over the coming months, some aspects of T-levels could make them a hard sell. The proposed grading system for T-levels has met with some opposition, for instance. The notion of awarding students a separate grade for the 'common core' and 'occupational specialism' for each T-level was generally accepted by respondents to the Government's consultation. However, the DfE has decided to use a six-point grading scale for the core (A*-E) and a three-point grading scale for each occupational specialism (Distinction, Merit, Pass). Many respondents disagreed with this approach "as this could be confusing for employers, students and parents" but the DfE claimed that using the same grading scale for the main elements of each T-level "had significant drawbacks".[197] Furthermore, the DfE has also decided to

192. Andrew Jack, 'Employers Not Ready for Rollout of T-Level Technical School Exam', *Financial Times*, 22 August 2018.

193. National Foundation for Educational Research, *National Evaluation of Diplomas: Preparation for 2008 Delivery (Research Report DCSF-RW079)*, 96.

194. Ibid.

195. Ibid.

196. Ibid., 108.

197. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 14.

introduce an overall T-level pass grade "in response to the desire to keep things simple"[198] and they are even exploring how higher overall grades could be awarded above an overall pass, i.e. Merit and Distinction.[199] This means that the final certificate given to T-level students will contain the following pieces of information:

- An overall pass grade
- A grade for the common core (A*-E)
- A grade for the occupational specialism (Distinction, Merit, Pass)
- A pass / grade for any additional certifications included within the T-level
- A numbered grade / pass for English
- A numbered grade / pass for mathematics
- Confirmation that the work placement has been completed

Compared to a single letter grade for an A-level or a Distinction / Merit / Pass for apprenticeships, this proposed system for T-levels is unlikely to win over many sceptical observers.

198. Ibid.
199. Ibid., 15.

Recommendations

The previous chapter began by outlining the strong similarities between GNVQs and Diplomas in terms of their botched introductions. The rest of the chapter described how T-levels are, regrettably, now heading down the same path by making almost exactly the same errors. This has, in turn, markedly reduced the likelihood of the T-level reforms succeeding where its predecessors failed:

- **A rushed introduction:** the evidence suggests that the timetable for introducing T-levels is too brisk. First and foremost, it leaves insufficient time for any delays or alterations to the existing plans, particularly when procuring, designing and approving the new qualifications. Second, employers remain unconvinced about the practicalities of offering sufficient work placements while providers cannot be expected to deliver the required quantity of placements in such a short space of time, especially in the absence of a considerable injection of funding for both parties.
- **Overly-ambitious goals:** the Sainsbury Review's ambition of 'bridging provision' to help students move from T-levels to academic courses (and vice versa) is hard to quantify and it is likely to be several months, possibly years, before this concept can even be tested, let alone realised. The lukewarm response from universities towards T-levels is entirely understandable in this context. Without being able to guarantee progression onto university, providers are likely to find it even harder to convince students to opt for T-levels when other reputable routes such as A-levels, BTECs and apprenticeships will be available instead. Moreover, the licensing ('franchise') model proposed for T-levels adds a considerable element of risk, complexity and uncertainty into their development for no discernible gain. The likelihood that the opening waves of T-levels will not attract a sufficiently high number of students to make the courses viable, or even have enough qualified staff in place, remains another area of concern.
- **Insufficient clarity for stakeholders over their purpose or links to other pathways:** after the Sainsbury Review criticised Diplomas for not appreciating that the two routes for technical education (classroom and workplace) need to be viewed as 'two sides of the same coin', it is disappointing that the same problem has emerged with T-levels. Instead of being created and delivered as two comparable options, T-levels have been set up as direct

competitors to apprenticeships even though they are manifestly inferior to apprenticeships as a programme of learning. As a result, the relationship between apprenticeships and T-levels does not match any example of international best practice. The lack of coherent links from T-levels to Applied General qualifications or to vocational qualifications above and below Level 3 only adds to the sense of dislocation surrounding T-levels.

- **Significant overlap with other qualifications:** the lack of clarity over the purpose and role of T-levels inevitably blurs the lines between the different qualification pathways. The overlap between T-levels, Applied Generals and even A-levels will make the system very hard for young people, parents, teachers and employers to navigate when they want to choose the right course for them. The clear parallels between T-levels and the existing employer-endorsed 'Tech Levels' for 16 to 19-year-olds was also not properly explored or understood during the design of T-levels, which means that the considerable progress made in improving technical qualifications in recent years could be squandered.
- **Lack of visibility:** the evidence thus far shows that employers and parents are largely unaware of T-levels. Teachers and students need to be provided with all the necessary information about any new qualification well before it starts, yet this is unlikely to occur under the current timetable for introducing T-levels. This means that, even if the DfE succeeds in procuring and designing T-levels on schedule, students and parents may simply ignore them in favour of other established qualifications in the months leading up to September 2020.

This chapter will describe a set of recommendations that are intended to change the way in which T-levels are being designed, delivered and promoted. The aim of these changes is to ensure that T-levels become part of the fabric of our qualification system and command the confidence of students, parents, teachers and employers.

Part 1: building a simple and stable qualification system for 16- to 19-year-olds

RECOMMENDATION 1

Three qualification pathways should be established to reflect the different purposes and forms of assessment for qualifications at 16-19. These pathways should be called 'Academic' (courses on specific subjects / disciplines assessed by examinations), 'Applied' (broad areas of employment assessed by a mixture of coursework and examinations) and 'Technical' (courses designed to train individuals in a specific trade or profession assessed through different methods).

In Ron Dearing's review of qualifications in 1996, he stated that it was essential to bring "greater simplicity, everyday English and stability into the system of qualifications".[200] This report endorses his remarks and the

200. Dearing, *Review of Qualifications for 16-19 Year Olds*, 6.

strategy outlined in his review to achieve this, namely the creation of three clearly demarcated pathways for 16-19 qualifications. These three pathways should be differentiated on: (i) their purpose; and (ii) the way in which they are assessed. For example, A-levels are intended to prepare young people for further academic study by giving them a comprehensive understanding of a specific subject or discipline, whereas an apprenticeship is designed to help someone achieve occupational competence in their chosen profession or trade. In addition, A-levels are now mostly based on 100% external examination whereas the current crop of Applied General qualifications must include a minimum of 40% external assessment and apprenticeships can use a combination of assessment methods. These benchmarks should continue in future to help distinguish between the different pathways.

Figure 6: The three new qualification pathways

	ACADEMIC	APPLIED	TECHNICAL
PURPOSE	To develop knowledge, understanding and skills associated with a subject or discipline	To develop and apply knowledge, understanding and skills relevant to broad areas of employment	To develop and recognise mastery of a trade or profession at the relevant level
FORM OF ASSESSMENT	100% external examinations	Minimum of 40% external assessment Additional assessment from other methods e.g. coursework, projects and practical performances	Combination of different methods e.g. theoretical (knowledge) test, workplace observation, viva, projects, interviews

RECOMMENDATION 2

The full range of 16-19 qualifications should be rationalised so that each subject, discipline or profession only appears in one of the three pathways e.g. Mathematics should be classed as 'Academic', Sport should be classed as 'Applied' and training to be a Plumbing Technician should be classed as 'Technical'.

Figure 4 in the previous chapter demonstrated the extent to which the existing qualification pathways frequently contain courses that are replicated in other pathways. Before T-levels are fully rolled out, it is necessary to rationalise the qualification landscape so that it is clear to students, parents and teachers what each course offers and by extension what it might lead to in future. To achieve this, each course should only appear in one pathway.

The decision about which pathway is most appropriate for each course should be made using the purpose and assessment methods found in the three pathways (as outlined in Recommendation 1). For example, it is not logical or helpful for there to be an A-level in Physical Education as well as an AG in Sport, or to have an A-level and AG in Business. Furthermore,

many A-level subjects are assessed using some form of coursework or performance by the learner. This includes, among others, Music, Physical Education, Art & Design and Theatre Studies. It is not sensible to place these courses directly alongside subjects such as Mathematics, which are assessed solely by written examinations. By matching each course to the most appropriate qualification pathway, it will hugely simplify the system for students, parents and teachers, and in doing so it will make the whole system easier to understand and navigate.

Figure 7: Examples of the courses within the three new pathways

ACADEMIC	APPLIED	TECHNICAL
Biology	Art & Design	Accountant
Chemistry	Business	Care Worker
English	Computing	Chef
French	Design & Technology	Engineer
Geography	Drama and Theatre	Hair Professional
History	Environmental Science	Laboratory Technician
Mathematics	Media Studies	Plumbing Technician
Physics	Music	Veterinary Nurse
Spanish	Sport	Welder

As the Dearing Review made clear, the placement of a course into a specific pathway is in no way a reflection of its quality, importance or esteem. The DfE should be unequivocal in demanding high-quality provision across all three pathways as well as encouraging learners to be aspirational regardless of which qualification they choose. The DfE may also wish to consider whether certain pathways should be restricted to particular types of providers (e.g. schools or colleges). In any case, the wider accountability system such as performance tables would place high expectations on providers to offer high-quality courses in all pathways.

Part 2: creating strong foundations for 16-19 technical education

In 2016, Policy Exchange published a major report by this author on apprenticeships entitled *The Skills We Need And Why We Don't Have Them*. Alongside recommending a series of changes to apprenticeships policy, the report explained how to build a stable infrastructure for technical education in terms of the institutions required to deliver the report's recommendations as well as describing each institution's respective roles and responsibilities. This new report on T-levels draws heavily on these previous recommendations, not least because T-levels and apprenticeships are now grouped together under the heading of 'technical education' in the Government's current reforms.

RECOMMENDATION 3

T-levels and apprenticeships should be designed as 'parallel' qualifications that consist of the same standard, training curriculum and final assessment for each occupation – based on the model used in the Netherlands and Estonia.

In the previous chapter, three different models were described for coordinating classroom-based and workplace-based vocational provision. In line with the 2018 OECD report on the English apprenticeship system, the closest of the three models to what was described in the Sainsbury Review is the 'parallel' model in which there are alternative routes to the same occupation, allowing apprenticeships to offer one way of acquiring the competences while other routes (in this case, T-levels) are also possible. This model is often associated with a competence-based final assessment, permitting different means of preparing for that assessment.

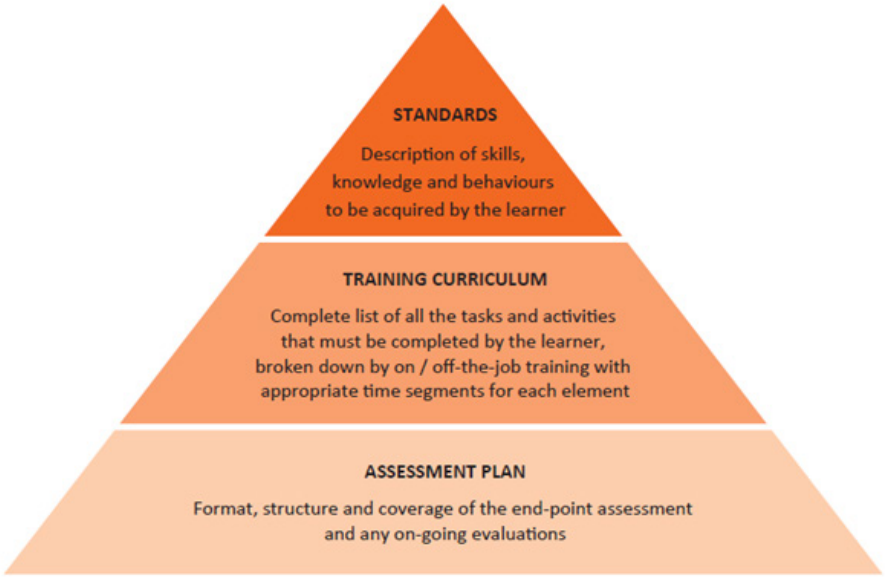
However, despite the Sainsbury Review calling for the DfE to introduce "a single, common framework of standards should cover both apprenticeships and college-based provision",[201] it failed to deal with two other important issues. First, an apprenticeship leads to 'occupational competence' (the ability to *do* a skilled job) whereas T-levels will only lead to 'threshold competence' (the ability to *start* a skilled job).[202] Second, T-levels and apprenticeships will have their own separate assessments for learners, which will inevitably lead to students acquiring different levels of skill and knowledge through the two routes – further distorting the technical education system. The Sainsbury Review rightly warned that "without a focus on alignment, the two modes of technical education will diverge, leading to a fragmented system, which is never seen in the leading international examples"[203] yet its proposals made this fragmentation more likely, not less. In *The Skills We Need*, the 'parallel' model was strongly endorsed as the best way to prevent this from happening, and this report echoes the same solution.

To achieve this, the two problems outlined above must be dealt with directly. First, as described in the Sainsbury Review, the same occupational standard should apply to both training routes – classroom and workplace-based training. That said, we recommend that a further component be introduced in the form of a high-level training plan or curriculum that contains a detailed list of the content that will be taught throughout the training. The occupational standard merely describes a set of goals for each training course rather than explaining what will be taught, which means that it is not possible for learners or teachers to see in advance what the course involves. Second, an assessment must be designed that encompasses all the content taught in the technical education course irrespective of the training route that was undertaken.

201. Sainsbury, *Report of the Independent Panel on Technical Education*, 17.
202. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 24.
203. Sainsbury, *Report of the Independent Panel on Technical Education*, 38.

Figure 8 shows how *The Skills We Need* summarised what each technical education course would include in future once this been implemented. Each course will essentially be a 'package' of an occupational standard, a training curriculum and a final assessment – all of which would apply to both the classroom-based and workplace-based training routes.

Figure 8: The final package for each technical education course



RECOMMENDATION 4

The examination regulator Ofqual should be put in charge of approving and monitoring all final assessments for technical education courses, and no Awarding Organisation should be involved in the technical education system unless they are regulated by Ofqual.

Although many new final assessments have already been designed in recent years by AOs through the apprenticeship reforms, the current approach to assessment has numerous deficiencies that have left the apprenticeship reform programme vulnerable to poor practice and even potentially fraudulent behaviour. *The Skills We Need* outlined the seriousness of the present situation:

> *"In a fiercely commercial environment, AOs have little choice but to compete with each other on the price of their assessments. This means that the incentives are pointing the wrong direction. The normal response would be that a regulator is in place to approve all AOs and to satisfy taxpayers that they are suitably high quality – as currently exists for all those AOs who wish to offer academic qualifications such as GCSEs and A-levels. That brand new AOs, who have never run Apprenticeship assessments before, will not be subjected to any oversight or supervision is a critical weakness in the reforms. To make matters worse, the assessment tools do not even have to be in place when an apprentice begins training against the new standard. This situation is wholly unacceptable in*

terms of protecting apprentices and taxpayers from unscrupulous behaviour by employers, training providers and AOs. It cannot be allowed to continue." [204]

This is not sustainable if technical education is to achieve the credibility and respectability that it deserves. This report therefore recommends that the examination regulator Ofqual be tasked with checking the reliability and validity of all new assessment tools proposed for each occupational standard for technical education. Following approval, Ofqual will be responsible for monitoring the use of the assessment tools over time through their normal regulatory oversight of AOs. Furthermore, given the substantial public funding that will be poured into technical education in future, only AOs regulated by Ofqual should be allowed to offer any assessments for technical education courses in order to protect the interests of apprentices and taxpayers. To achieve this, Ofqual should be given formal responsibility for managing the 'Register of end-point assessment organisations' that is currently overseen by the Education and Skills Funding Agency.

RECOMMENDATION 5

The Institute for Apprenticeships (IfA) should become the voice of technical education for all post-16 learning. The IfA should also be reconstituted so that it becomes a collaborative and representative body for the whole 'skills system'.

As discussed in *The Skills We Need*,[205] the question of who speaks for employers in the UK education system is a longstanding debate. Industrial Training Boards, the Manpower Services Commission and National Training Organisations were all attempts to answer this question in previous years, yet none stood the test of time. There is still no stable infrastructure in which employers can articulate their skills needs to government, colleges, universities and other stakeholders. If the Government wishes to see their plans for technical education succeed (both T-levels and apprenticeships), such an infrastructure needs to be established – and soon.

One of the threads running through past attempts to understand the needs of employers is that employers are generally grouped together by sector. Admittedly, each attempt produces a slight variation in terms of the number of 'groups' (e.g. Sector Skills Councils (SSCs) started with 25, later reduced to 16; 8 Industrial Partnerships; 15 new technical education routes in the Sainsbury Review). Even so, a clear articulation of the broad classification of employer groups is vital for providing a solid infrastructure to support reforms to apprenticeships and technical education. Given the analytical work that underpinned the Sainsbury Review, it seems prudent to use its final list of 15 'routes' as the basis on which to build the technical education system.

Another recurring feature found in countries with stable and respected technical education systems is that they have a body or agency sitting above a set of sector-based groups that provides governance and oversight of both the sectoral groups and the system as a whole. Examples include:

- the Federal Institute for Vocational Education and Training (BiBB)

204. Tom Richmond and Jonathan Simons, *The Skills We Need And Why We Don't Have Them* (London: Policy Exchange, 2016), 57.

205. Ibid., 60–61.

in Germany
- the Cooperation Organisation for Vocational Education, Training and the Labour Market (SBB) in the Netherlands
- the National Council for Vocational Education and Training in Norway

Building on the international evidence, we therefore recommend the IfA (recently renamed the Institute for Apprenticeships and Technical Education; and henceforth referred to as IFATE) should be given a wider remit. It will be responsible for:

- establishing and operating the framework of 15 new technical education routes from levels 2 to 5 and the qualifications within them
- coordinating the new 'Technical Education Councils' (see next recommendation) to developing new occupational standards, training curricula and final assessments
- conducting research on technical and vocational education research both in this country and abroad
- producing and distributing labour market research and intelligence
- disseminating the skills needs of employers through an annual 'National Skills Report' that describes the current areas of strength and weakness in the UK labour market (similar to the 'State of the Nation' report prepared annually by the Social Mobility Commission)

We support the observation in the Sainsbury Review that the IFATE must be given wide-ranging autonomy over its functions[206] to prevent politically-charged interventions or vested interests interfering in their work. Organisations such as the UK Commission for Employment and Skills (UKCES) were funded as separate bodies from central government but in reality they were never given true autonomy nor were they able to establish their own agenda or openly disagree with ministers. There is little to be gained by repeating past mistakes, which is why the autonomy of the IFATE should be upheld. We recommend that IFATE is given the same degree of independence as the examination regulator Ofqual, which is classed as a non-ministerial government department and is accountable to Parliament instead of the Department for Education. This is the best way to prevent IFATE going the same way as its predecessors through constant meddling, changing remits and responsibilities, funding cuts or similarly damaging events.

Ensuring that the IFATE has the necessary autonomy from government to shape the technical education system should reassure stakeholders that their work will be valued and protected going forward. Nonetheless, early indications suggest that the IFATE has not won the respect of many stakeholders so far. In fact, there has been sustained criticism of the IFATE since it was created. At present, its responsibilities are threefold:

206. Sainsbury, *Report of the Independent Panel on Technical Education*, 39.

first, organising and approving apprenticeship standards and assessment plans; second, recommending a funding band for each standard; and third, ensuring that all final (end-point) assessments have quality assurance procedures in place (either by the IFATE themselves or another organisation).[207] A recent House of Lords report into education and training routes for young people heard from numerous witnesses that the performance of the IFATE, since it formally began operations in April 2017, has been deeply disappointing. On the issue of approving apprenticeship standards, it was variously described to the Committee as "bureaucratic" and "a source of frustration for employers and a huge business risk to training providers."[208] Its approach to funding bands has fared little better, forcing the IFATE to admit that stakeholders had told them "the process is too slow – leading to delays and frustration".[209] In the end, the House of Lords committee decided that the best course of action was to abolish the IFATE.[210] The Education Select Committee was not much more charitable in their report on apprenticeships in October 2018:

> *"Our predecessors were supportive of the creation of the [IFATE]; we have heard more mixed views, with some employers being privately very critical of its approach. It has a difficult job: a supposedly employer-led body required to take direction from the Secretary of State, but at times it has appeared more successful at uniting stakeholders in opposition than anything else. We could do with fewer unseemly spats and vainglorious announcements, and more action."*[211]

While the Committee accepted that the IFATE inherited several problems stemming from earlier mistakes made by the DfE, this does not justify the frequency with which it has let down, and in some cases angered, key stakeholders. This tense atmosphere is in stark contrast to the more collaborative and constructive approach engendered by the 'social partnership' model used by the UKCES as a non-departmental public body that provided advice on skills and employment policy to the UK Government and the devolved administrations from 2008 to 2016. The UKCES was chaired by Sir Charlie Mayfield, Chairman of the John Lewis Partnership, and was overseen by a group of 30 'Commissioners' who were an impressive mixture of businessmen and women, trade union representatives and education, employment and skills experts from academia and training providers. This shared ownership of the skills system among all the relevant stakeholder groups made the UKCES a widely supported organisation that provided a crucial interface between government and the world of employment. It also boasted an impressive research and analytical capability that has been mostly lost following its closure.

If the IFATE is to earn the trust and respect of stakeholders, it cannot continue on its existing path. Its senior management team includes numerous former civil servants, which does not help matters when it comes to conversing with, and understanding, employers. A new setup is needed to complement the expanded role that this report proposes. To put the IFATE at the heart of the new technical education system, it will be necessary to change the constitution of their governing body so that it

207. House of Lords Economic Affairs Committee, *Treating Students Fairly: The Economics of Post-School Education - 2nd Report of Session 2017–19*, HL Paper 139 (London: Her Majesty's Stationery Office, 2018), 77.

208. Ibid., 73.

209. Ryan, George, 'Institute for Apprenticeships to Change Funding System as Current Approach "Doesn't Work Well"', *Times Educational Supplement*, 13 February 2018.

210. House of Lords Economic Affairs Committee, *Treating Students Fairly: The Economics of Post-School Education - 2nd Report of Session 2017–19*, 77.

211. House of Commons Education Committee, *The Apprenticeships Ladder of Opportunity: Quality Not Quantity - Sixth Report of Session 2017–19*, HC 344 (London: Her Majesty's Stationery Office, 2018), 16.

is much more in line with the UKCES's previous model. This would mean guaranteeing representation from business groups, trade unions, leading academics and other education and skills experts.

With a new governing body in place, the next step is for the DfE and/or Parliament to set clear goals for the IFATE that reflect the pivotal role it will play in delivering technical education. These goals could be, for example:

- Delivering technical education programmes at all levels that are benchmarked against the best systems in the world
- Improving the productivity and progression of those in work
- Ensuring that technical education programmes keep pace with wider economic and technological changes
- Providing high-quality advice on current and future arrangements for organising and delivering technical education to ministers in the UK Government and the devolved administrations

The collective expertise from the new governing body, coupled with the new remit for the IFATE outlined earlier in this section and a widely-agreed set of goals for what the organisation must deliver, will put the IFATE on a path towards being a credible and respected voice in our education and training system – something that it is evidently failing to achieve at the moment.

RECOMMENDATION 6
The existing 'Trailblazer' groups of employers that design apprenticeship standards and assessment plans should be merged with the employer panels designing T-level content to create a single 'Technical Education Council' for all 15 occupational routes described in the Sainsbury Review.

To realise the ambition of a coherent package for each technical education course that fully aligns T-levels and apprenticeships, it is necessary to put in place a stable set of institutions that speak on behalf of employers within the wider technical education system. Building on the Sainsbury Review and following the model used in Norway, we recommend establishing a 'Technical Education Council' (TEC) for each of the 15 occupational routes defined by the Sainsbury Review to underpin T-levels. This would be a permanent body, comprised of experts (representing both employers and employees) from within their sector / route. The easiest way to implement this would be to combine 'Trailblazer' groups of employers with the T-level employer panels to form a single body that speaks on behalf of the sector. Once formed, the TEC's core responsibilities would be to:

- produce the standards, training curricula and final assessments for each recognised occupation within their route from levels 2-5
- articulate employer needs in terms of current and future skills
- coordinate the production of careers information, advice and educational guidance (CIAEG) material based on the new occupational standards

In this new system, the TEC network would be overseen by the IFATE. It is not envisaged that the IFATE would manage the day-to-day work of each TEC as the TECs must be seen as the voice of each sector. That said, the IFATE would set the overall objectives for the skills system (e.g. delivering technical education programmes that match the best systems in the world) and then hold each TEC to account for their actions and achievements against these benchmarks.

Part 3: a new way to design and deliver T-levels

The previous chapter detailed the volume of concerns expressed by the Education Select Committee when they investigated the Government's earlier proposals to offer franchises to deliver GCSEs. These concerns included, among other things, the cost, disruption and risks incurred by moving to new system, the lack of incentive to maintain quality and innovate during the lifetime of a contract and the concentration of examiner expertise in one organisation (which would be problematic when a franchise is up for renewal and/or if contracts change hands). Given the enormous pressure that T-levels are already facing in terms of timescales, quality assurance and ensuring that they fit within the wider vocational system, it seems unwise to introduce even more risk and complexity when other equally-positive options are available.

RECOMMENDATION 7

Replace the 'single awarding body' (franchise) model for T-levels with a 'single assessment' model (one assessment, multiple providers) to reduce the level of risk facing the T-level reforms and to help align T-levels and apprenticeships.

In the Education Select Committee's final report in 2012 on the proposed franchising of GCSEs, they put forward an alternative suggestion that they believed would lead to a similar outcome - termed a 'national syllabus'. The idea was that a single syllabus (accredited by Ofqual) would be created for each subject and then regarded as a 'national resource' that could be examined by any of the exam boards / AOs. The Committee believed that this approach "would remove the incentive for exam boards to compete on syllabus content, while retaining current incentives for operational efficiency, innovation and quality of service to schools."[212] It was envisaged that the syllabus could be designed in conjunction with representatives from higher education, learned bodies and employers to reflect the academic nature of GCSEs, and each exam board would subsequently have to gain an endorsement from these stakeholders for their final syllabus. Ofqual would then monitor the question papers designed by each exam board to take account of, and adjust for, any differences in demand between question papers.[213] The Committee concluded that "national syllabuses would offer a way of addressing downward competition on content and provide reassurance on standards, without the risks, lost benefits and disruption involved in moving to a single board."[214]

This type of model is a strong candidate to replace the franchised model currently being proposed for T-levels, although some adjustments would be required. This is largely because the final assessment for both T-levels and apprenticeship training routes must be the same to deliver the 'parallel' model for T-levels and apprenticeships outlined in earlier recommendations. Consequently, this report recommends that a similar idea – termed the 'single assessment' model – is introduced to draw on the benefits of a national syllabus in the context of T-levels:

- After designing an occupational standard and the associated training curriculum, the TEC will publish their expectations of what the final assessment for each standard would encompass (similar to the 'assessment plan' currently published by Trailblazer groups as part of the apprenticeship reforms)
- Each AO that wishes to deliver the final assessment would submit an 'expression of interest' to the TEC, which would be judged on the AO's expertise and capacity in that occupation or industry
- The AOs that the TEC approves to deliver the final assessments will work together to produce a single set of assessment tools for each standard that meet the requirements outlined by the TEC
- This single set of assessment tools (once approved by Ofqual) would be used by all AOs assessing learners from both the T-level and apprenticeship training routes

212. House of Commons Education Committee, *The Administration of Examinations for 15–19 Year Olds in England: First Report of Session 2012–13*, 1:33.

213. Ibid., 1:34.

214. Ibid., 1:35.

This 'single assessment' model will dramatically simplify the system for AOs, providers and employers. It will also allow Ofqual to focus their efforts on a far smaller number of assessment tools when assessing their validity and reliability – something that is simply not possible in the apprenticeship reforms at present. In addition, the level of risk facing T-levels will be significantly reduced without having to sacrifice the quality of the new qualifications.

RECOMMENDATION 8
Allow AOs who currently offer relevant and comparably-sized qualifications to join a consortium that is given responsibility for creating each new T-level within the first two waves for delivery in September 2020 and September 2021.

Given the system-wide changes discussed throughout this recommendation section that are required to ensure that T-levels survive in the longer term, it is imperative that the early stages of the T-level reforms do not inadvertently prevent those wider changes from being rolled out. Should the plans to award a 'license' to design and deliver the first wave of T-levels in March 2019 go ahead, many of the changes that are needed in the technical education system surrounding T-levels will be extremely difficult, if not impossible, to deliver. This will be most keenly felt in the move to align T-levels and apprenticeships in terms of their standards, curricula and assessments, which will be undermined if T-level licenses that run for many years into the future are given to a single AO. The overall alignment will take several years to implement in any case, but it will simply not be possible to bring the two training routes together if crucial policy decisions send them in different directions at this stage.

This report recommends that the first two waves of T-levels are based heavily on the existing qualifications available for 16 to 19-year-olds. It is not feasible to directly 'cut and paste' across from existing qualifications as they do not exactly match the 900 GLH expected of T-levels, and they are unlikely to have a built-in requirement for a 45-day work placement. Even so, the following 'Tech Levels' bear a strong resemblance to the first three T-levels proposed for 2020:

Construction: Design, Surveying and Planning

- Pearson BTEC Level 3 National Extended Diploma in Construction and the Built Environment
- City & Guilds Level 3 Advanced Technical Extended Diploma in Constructing the Built Environment

Digital: Digital Production, Design and Development

- City & Guilds Level 3 Advanced Technical Extended Diploma in Digital Technologies
- OCR Level 3 Cambridge Technical Extended Diploma in IT

Education and Childcare

- NCFE CACHE Technical Level 3 Diploma in Childcare and Education
- Pearson BTEC Level 3 National Extended Diploma in Children's Play, Learning and Development

In order to keep the T-level reforms in motion while also allowing more time to put the necessary building blocks in place for the wider technical education system, it is recommended that any AO currently offering a closely-related and comparably-sized qualification to the first two waves of T-levels should be allowed to join a consortium that is tasked with designing the new qualifications. This consortium will be directed by the T-level employer panel to construct a new T-level qualification and final assessment that matches their requirements. By using a consortium of experienced AOs who already deliver related qualifications, the on-going (and entirely justified) concerns around the timescale for designing and implementing T-levels will be reduced. This is particularly relevant when considering the possible delays from waiting for approval from the IFATE and Ofqual before delivery can begin, which the current timescale makes little allowance for (if any).

Having existing AOs collaborate to produce the first two waves of T-levels in the short-term will then allow enough time for the 'single assessment' model to be implemented across the technical education system from 2022 onwards. This report does not underestimate the significance of abandoning the on-going procurement for the licenses to deliver the first wave of T-levels, but any concerns on this matter must be weighed against the damage that could be done to the likelihood of T-levels surviving in future if the current plans continue unabated.

Part 4: opening new channels of funding for technical education

The Sainsbury Review was unequivocal on the need to invest in technical education if we are to secure a step-change in the quality of technical education in this country:

> *"A strong financial commitment from the Government is required to build a progressive and sustainable infrastructure, which in turn would drive up the quality of technical education. The vision should be that any new funding system should encourage and not deter employers from participating, and that it should be possible to ensure that employers do not end up worse off"* [215]

The recommendations above have outlined how to assemble a sustainable infrastructure for technical education, but this leaves two issues unaddressed: first, where will the money come from to build and maintain this infrastructure; and second, how can the funding system ensure that employers are encouraged to participate in T-levels?

215. Sainsbury, *Report of the Independent Panel on Technical Education*, 70.

RECOMMENDATION 9

Levy-paying employers should be allowed to transfer up to £50,000 of their levy contributions to fund the TEC in their industry sector.

If the Government wishes to engage employers in the task of helping them build a world-class technical education system, they will need to have a stake in it. Although a comprehensive review of the apprenticeship levy is beyond the scope of this report, it is nevertheless recommended that the Government use the lever they already have in place to generate a strong commitment from employers to assemble the infrastructure described in earlier recommendations. This will promote the role of the TEC as the 'voice' of each sector and will also mean that levy-paying employers can use their financial resources to support and drive forward the wider technical education system rather than simply worrying about their own interaction with the levy.

RECOMMENDATION 10

Levy-paying employers should be allowed to draw down £1,500 of their levy contributions to fund each T-level work placement.

This report has repeatedly emphasised how difficult it will be to engage employers in delivering the quantity of work placements required by T-levels. The Sainsbury Review was insistent that "widespread, locally-brokered expansion of work placements will only be delivered if colleges and employers know that facilitating funding will continue in the long-term", which is why it recommended that an additional £500 per work placement would be required to deliver their ambitions.[216] However, the DfE's 'Capacity and Delivery Fund' is only providing £250 per learner as part of their work placement pilots.[217] Given the pivotal role that these placements will have on the feasibility, attractiveness and overall success of T-levels, this report recommends that the DfE goes much further in trying to drive increases in capacity and capability among providers and employers. The levy contribution made by large employers is an obvious candidate for generating additional financing for work placements, which will help fulfil the Sainsbury Review's vision of ensuring that employers do not end up worse off because of these placements.

Areas for further consideration

Provision at Level 2 and below

At the time of writing, the purported review of Level 2 qualifications and the design of the new 'transition year' have not been completed. In fact, it appears that the 'transition year' may no longer exist at all. Despite the phrase being used throughout the Sainsbury Review and by the Government in their consultation on T-levels in November 2017, their response to the consultation in May 2018 did not use the phrase 'transition year' at any point and instead referred to a 'transition offer'.[218] Such a change of emphasis makes it even more difficult to provide substantive analysis and commentary at this stage. Nevertheless, seeing as this report

216. Ibid., 54.

217. Education and Skills Funding Agency, 'Industry Placements: Capacity and Delivery Fund (CDF) for 2019 to 2020 for Providers in Receipt of CDF in Academic Year 2018 to 2019', 9 July 2018.

218. Department for Education, *Implementation of T Level Programmes: Government Consultation Response*, 37.

has set out several system-wide changes that are required to make T-levels a success, it is important to consider what might be available to students who do not progress onto A-levels or T-levels. Through their review of provision at Level 2 and below in the context of T-levels, we suggest that the DfE investigate the following options as a way of promoting technical education and ensuring smooth transitions for learners:

- The DfE could insist that any 'technical awards' available at Level 2 are aligned with specific occupations available within the 15 'technical' routes outlined in the Sainsbury Review or an 'Applied' course available at 16-19
- The transition year could involve a 'rotation' between two or more of the 15 routes. Each route would be studied at a basic level for approximately one academic term / three months in order to give learners more time to prepare for study T-levels and choose their preferred occupational route while also working on their literacy and numeracy skills (if necessary). A short work experience placement would be included for one of the routes chosen by the learner.

'Traineeships' could become a more established part of the technical education routes by aligning them with the transition year. For example, Traineeships could include one of the basic introductory programmes used in the 'rotation' outlined above. This would give them greater focus on a particular sector as well as including work preparation training and work experience in that sector. Effectively, this would make Traineeships a shorter version of the full 'transition year'.

T-level grading

Earlier in this report, the complicated grading structure of T-levels was raised as a potential issue for learners and employers. The examination regulator Ofqual recently published their consultation for how they intend to regulate technical qualifications in future.[219] In their consultation, it became clear that some elements of the assessments for T-levels will be based, at least to some extent, on the approach taken to academic qualifications. For example, the consultation confirmed that assessments for 'core knowledge and understanding' must be assessed through 'Assessment by Examination' i.e. set by an AO and be taken simultaneously by all relevant learners at a time determined by the awarding organisation under strict conditions.[220] Whether this approach will work for technical education remains to be seen. More importantly, though, Ofqual's intended approach to monitoring T-levels is markedly different from its role in assessments for apprenticeships. As this report has made clear, it is only by combining the final assessments for T-levels and apprenticeships that alignment between the two routes can be achieved. A more detailed conversation will be required to determine how much the new combined assessment for both routes should reflect the existing arrangements for apprenticeship assessments as opposed to the proposed arrangements for T-levels.

219. Ofqual, *Implementation of Technical Qualifications: Consultation on Rules and Guidance for Technical Qualifications* (Coventry: Ofqual, 2018).

220. Ibid., 12.

Addressing poor-quality technical education

The task of determining the precise content and topics within each T-level has been largely left to employers, which is a sensible approach. That said, it has become clear from the on-going apprenticeship reforms that employers do not always act in the best interests of learners and taxpayers. This author has described in an earlier report how some employers have taken advantage of the opportunity given to them by government to shape the content of apprenticeships by relabelling a number of low-quality, low-skill roles as 'apprenticeships' in order to access the available funding.[221] This has meant that around 40% of the learners starting an 'apprenticeship' using the new employer-designed standards are now on courses that fail to reach the international or historical definition of an apprenticeship. As a result, at least £600 million will soon be spent each year on courses incorrectly labelled as 'apprenticeships'.[222]

The Sainsbury Review has previously aired similar concerns:

> *"…we are […] concerned that some existing apprenticeship standards, at least at face value, seem to overlap significantly with others, be firm- rather than occupation-specific, and/or contain insufficient technical content. If this is indeed the case, it risks a proliferation of low-value or niche standards, creating complexity and recreating all the problems of the previous system."*[223]

The Review recommended that "at the earliest opportunity, the Institute for Apprenticeships reviews all existing apprenticeship standards to satisfy itself that there is no substantial overlap between standards, and that every standard is occupation- rather than firm-specific and contains sufficient technical content to warrant at least 20% off-the-job training", adding that "standards found to be overlapping or wanting in terms of breadth or technical content should be revised, consolidated or withdrawn."[224] This review of all apprenticeships has not been implemented over two years on, raising the prospect of numerous poor quality standards still being used around the country.

It is essential that all low-quality programmes masquerading as courses in 'technical education' are removed from our education system as a matter of urgency. Any attempt by this Government (or subsequent governments) to increase the prestige and credibility of technical education, particularly in comparison to academic qualifications, could be seriously undermined if poor-quality provision goes unchallenged. This report has not made specific recommendations on this matter as it has focused more on the design and delivery of T-levels. However, all the recommendations are predicated on the DfE and all associated organisations involved in the technical education system – especially the IFATE and Ofqual – prioritising the creation and maintenance of rigorous programmes as well as rejecting any technical programme or qualification that fails to meet stringent quality standards.

221. Tom Richmond, *The Great Training Robbery: Assessing the First Year of the Apprenticeship Levy* (London: Reform, 2018).

222. Ibid., 5.

223. Sainsbury, *Report of the Independent Panel on Technical Education*, 40.

224. Ibid., 41.

Conclusion

> *"What we have is the product of history. Initiatives have followed one another over time. Each has been designed for its own purpose, with limited concern to provide coherence and ready understanding on the part of students, parents and employers. [...] It is all too easy for those professionally engaged in the central administration of qualifications to over-estimate the level of knowledge about the present maze of qualifications among parents and small and medium sized employers. Even those engaged in education sometimes need help."* [225]

For an observation made about vocational qualifications and our education system more broadly by Sir Ron Dearing in 1996 to be just as relevant in the present day is quite remarkable. The fact that we are still having the same conversation about solving the same problems over two decades later illustrates the sheer scale of the challenge facing T-levels – namely, to find a way to survive a lot longer than their two predecessors, GNVQs and Diplomas. Like their predecessors, T-levels have identified a genuine problem within our education system and have set off with the best intentions to solve it. However, good intentions alone will not be enough when reforming a technical education system that has consistently failed to deliver world-class training programmes.

The title of this report – *A Qualified Success* – is intended to convey the message that T-levels have the potential to make a substantial contribution to our education system, but this will only be realised if T-levels are conceived, designed and delivered in the wider context of building a high-quality and sustainable technical education route for young people. One of the biggest mistakes made by Diplomas and GNVQs was that it was not clear how they were supposed to fit with, and operate alongside, other qualifications and programmes. Too many elements of the T-level reforms (particularly the distance between them and apprenticeships as well as the proposed franchising model for assessment) are likely to cut T-levels adrift from the rest of the 16-19 system. The end result of this will be that T-levels are left vulnerable to any future changes in educational or political winds.

The recommendations in this report have described a new path for T-levels that meets the Government's stated ambitions for the programme and allows them to maintain the momentum of the reforms while simultaneously constructing a broader technical education system in which T-levels can play a central role for many years to come. Far from representing a retreat for the T-level reforms, this report proposes that the Government should in fact be much bolder and more ambitious for what they can achieve. That is not to say this will be an easy journey, especially

225. Dearing, *Review of Qualifications for 16-19 Year Olds*, 11.

when T-levels have got off to an inauspicious start. Nonetheless, the Sainsbury Review was right to conclude by saying that "it is time now to focus on actually delivering what has been called for so many times in the past: a system of technical education in England that is the match for any in the world."[226] We couldn't agree more.

226. Sainsbury, *Report of the Independent Panel on Technical Education*, 74.

Appendix

Suggested timetable for building a world-class technical education system

	Part 1 Building a simple and stable qualification system for 16- to 19-year-olds
2018-2019	The DfE announces that three qualification pathways will be established to reflect the different purposes and forms of assessment for qualifications at 16-19. These pathways will be called 'Academic', 'Applied' and 'Technical'.
2019-2020	The DfE rationalises the full range of 16-19 qualifications so that each subject, discipline or profession only appears in one of the three pathways.
2020-2021	
2021-2022	
2022 onwards	

	Part 2 Creating strong foundations for 16-19 technical education	Part 3 A new way to design and deliver T-levels	Part 4 Opening new channels of funding for technical education
	The DfE makes the following announcements: 1. In future, Apprenticeships and T-levels and will be designed as 'parallel' qualifications that consist of the same standard, training curriculum and final assessment for each occupation. 2. Ofqual will be put in charge of approving and monitoring all final assessments for apprenticeships and T-levels. 3. The Institute for Apprenticeships and Technical Education (IFATE) will become the voice of technical education for all post 16 learning. 4. 'Technical Education Councils' (TECs) will be established for all 15 occupational routes described in the Sainsbury Review.	The DfE announces that they will replace the 'single awarding body' (franchise) model for T-levels with a 'single assessment' model (one assessment, multiple providers). AOs who currently offer relevant and comparably-sized qualifications are invited to join a consortium that is given responsibility for creating each new T-level within the first two waves for delivery in September 2020 and September 2021.	
	Ofqual assumes formal responsibility for approving and monitoring all final assessments for technical education courses and takes control of the 'Register of end-point assessment organisations'. All AOs who wish to deliver assessments for technical education courses must now be regulated by Ofqual. The IFATE is reconstituted in line with 'social partnership' model used by the UKCES. Existing apprenticeship 'Trailblazer' groups of employers will be merged with panels designing T-level content to create new TECs.	AOs involved in each consortium design the new training curriculum and assessment for T-levels and secure approval from the IFATE and Ofqual.	Levy-paying employers are allowed to transfer up to £50,000 of their levy contributions to fund the TEC in their industry sector.
	TECs must ensure that all apprenticeship standards that reach their 3-year renewal point are converted to 'occupational standards' that match the occupational maps designed following the Sainsbury Review. The training curriculum and assessments for apprenticeship standards must now be aligned with the training curriculum and assessment for any new T-levels in the same occupation.	Providers commence delivery of the first wave of T-levels using the approved training curriculum and assessments.	Levy-paying employers are allowed to draw down £1,500 of their levy contributions to fund each T-level work placement.
		Providers commence delivery of the second wave of T-levels using the approved training curriculum and assessments.	
	All T-levels and apprenticeships designed / renewed from this point forward are now based on a single set of occupational standards that are accompanied by a training curriculum and a single assessment that apply to both routes.		

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