



T level consultation – Implementation of T level programmes
Department for Education

APM response, 8 February 2018

Who we are:

The Association for Project Management (APM) is a registered charity with over 23,000 individual and 570 corporate members making it the largest professional body of its kind in Europe. As the *Chartered body* for the project profession, APM is committed to developing and promoting project and programme management through a wide range of activities including membership, qualifications, events and enhancing standards and knowledge in the profession. We were in the vanguard in developing apprenticeships and worked with employers in developing a Level 4 apprenticeship in 2016 as part of the trailblazer programme. Currently we are working with employers on the Level 6 trailblazer integrated degree apprenticeship.

Introduction:

Since the 1980s the FE and skills sector has been subject to just short of thirty major pieces of legislation – with approaching fifty secretaries of state handling responsibility for FE. Given that no organisation has survived longer than a decade, it is understandable that a mass overhaul of technical education is greeted tentatively both across the project profession and indeed British industry more generally. The similarities between the plans for T-Levels and the *14-19 diplomas* that previous governments tried to develop – introduced in 2008 and phased out in 2013 – and other initiatives such as *Traineeships* are striking. Whilst the objective to raise the status of vocational routes is right, Government must heed the legitimate concerns of employers, providers, and other key stakeholders if T-levels are to avoid falling prey to the same pitfalls that other “once-in-a-generation” policy initiatives have. Making full use of policy memory is also critically important.

That the reform to technical and professional education and training featured as a *key pillar* of the productivity plan *Fixing the foundations: creating a more prosperous nation* – published following the General Election in 2015 – was a welcome acknowledgement of the importance of reform in this area. The subsequent announcement by the skills minister of the government’s plans for “ground-breaking reforms to technical and professional education” was given further credibility by the announcement of a comprehensive review – led by Lord Sainsbury of Turville. The *Independent Panel on Technical Education*, established in November 2015 to advise ministers on actions to improve the quality of technical education in England, had as its remit instructions to “assist with simplifying the current system, ensuring that the new system provides the skills most needed in the 21st Century.”

APM welcomed the key recommendations made by the *Independent Panel* in Lord Sainsbury’s report – published in July 2016. In particular:

- Creation of a single, common framework of standards covering both apprenticeships and college-based provision, designed to deliver the knowledge, skills and behaviours required to perform successfully in specific occupations and not the narrower job role-focused needs of individual employers.
- Establishment of a common framework of 15 routes, encompassing all employment-based and college-based technical education at levels 2 to 5.
- A review, at the earliest opportunity, of all existing apprenticeship standards to ensure no substantial overlap between standards and that every standard is occupation specific and contains sufficient technical content to warrant at least 20% off-the-job training. **Standards found to be overlapping or wanting in terms of breadth or technical content should be revised, consolidated or withdrawn.**

The government accepted these recommendations unequivocally in its *Post-16 Skills Plan* and committed to implement these recommendations “where possible within current budget constraints.”

In addition to supporting the broad principles underpinning the proposed reforms to technical and professional education and training, APM agrees that the quality and perception of technical and professional education should be increased. At age 16, young people have for too long been confronted with a choice between a *wholly academic route* and a *wholly vocational route*. As the credibility and esteem of Apprenticeships grows, this choice is becoming less and less stark, but T-levels must not be a dilution of Apprenticeships but must instead allow for a blended route where young people can seamlessly mix academic and vocational approaches. Critical to the success of this must be the creation of a system that is not only flexible enough to facilitate this, but does so while avoiding complex bridging provisions.

The answers we provide below in our consultation response build on our concerns about T-levels being considered the poor cousin of Apprenticeships. We express concern that key details remain undefined, and that the placement element of T-levels will be overly burdensome for employers and providers – who will need the capacity/infrastructure to find, facilitate, approve and monitor quality work placements. The proposed funding does not facilitate this and is inadequate if T-levels are to be a success. It is crucial that employers are both onside in this policy development and have a capacity to support its delivery.

Project management as profession, but also a life skill

A key point for the project profession in relation to T-levels is that although *Project Management* (as an occupation) currently sits in the *Business and Administration* route, we see that there is also potential for Project Management to be mapped across a number of T-Levels given that other occupations have the specific requirement for project management skillsets. Additionally, we would assert that project management as a *life skill* would benefit learners across all 15 routes.

Indeed, academic studies have begun to explore the potential developmental and social benefits of teaching project skills to children via *project-based learning* in the classroom. With more work delivered through projects, and with the tools, techniques, skills and competencies of project management applicable with *equal efficacy* to any endeavour meeting the criteria of a project, learning project management as a *life skill* increases productivity to the benefit of the individual, the organisation, and by extension, the economy more widely.

Incorporating a project management module alongside the maths, English, and digital requirements – or within the core element of the technical qualification – would benefit learner, employer, and the occupation alike. Given that core employability skills are to be assessed through practical employer-set projects, this would be an ideal way to provide practical application of project management skills.

It is important that the value of project management is seen as being both horizontal (spanning a variety of occupational routes as a modular approach) as well as vertical (as a management discipline). In this sense our response is more complicated than some as it does not fit easily into appropriate boxes and definitions.

Question 1:

Do you agree that the principles outlined above are the right ones on which to base a review of which level 3 qualifications we should continue to fund in the new system, alongside T levels and A levels? Yes/No. If no, what other principles do you think we should consider?

Whilst the three key principles in assessing continued funding are ostensibly the right principles, we are concerned that these are subjective and to that end there must be criteria against which these principles are judged.

Question 3:

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

If core employability skills are to be assessed through practical employer-set projects “in order to ensure a motivating and authentic work relevant focus to how they are applied” this approach gives rise to the following questions:

- How will employers be involved in setting projects / encouraged to set projects?
- How will consistency be ensured / how will standardisation of assessment be achieved?
- Are we trying to recruit employers to become assessors?
- Is the intention that the employer-set projects will be completed during the work placement / assessed by the employer during the placement?

Another important question is who will be assessing the occupational specialism? Will assessment be devolved to training providers, will it be the employers, or will it be completed directly by the awarding organisation?

Question 4:

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

While combining the grading methods of A* – E for the core component and pass/distinction/merit for the occupational specialism mirrors that of A level science subjects (which have a grade of A* to E in addition to an endorsement of pass/merit/distinction for the *practical* element), this system is likely to be confusing for employers.

Secondly, this is not clearly aligned with the approach to grading for trailblazers where the trailblazer requirement is that all apprenticeship standards are graded “with at least one level above a pass in order to recognise exceptional performance” – for example, pass + distinction *or* pass, merit, *and* distinction. If trailblazers are only assessed with pass + distinction, how will the grading for a T level be comparable to this where grade boundaries will have to be revised to accommodate pass, merit *and* distinction?

Question 5:

Do you agree with the approach to maintaining comparable standards of performance for technical qualifications? Yes/No. Please give reasons for your response.

In addressing comparable standards of performance, the consultation document does not provide sufficient detail as to how this will be achieved – limiting our ability to comment on the approach.

Whilst it is advantageous to involve employers in supporting standardisation of assessors and grade awarding, clarity must be provided as to whether SMEs will be represented as well as large corporates. Employer input must be balanced with assessment expertise.

Question 7:

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

We acknowledge the benefit of a strong work placement element within the T level programme however the proposed approach is *fraught with difficulties*. The system is dependent upon providers having the infrastructure to find, facilitate, approve and monitor *quality* work placements. Willing and suitable employers will need to be sought out, vetted, and fully informed about their commitment to providing placements (and all that this entails). Many employers are still grappling with apprenticeships and absorbing the levy so there is a danger that T-Levels may be seen as a bridge too far at this stage.

We are concerned that the logistical considerations of delivering a T level programme are burdensome for both the employer and provider, and it is difficult to reconcile learner experience with the limited resources that will be available. Substantial additional funding – way beyond the piecemeal £74million – will be required.

Question 9:

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

The proposed approach is both burdensome for employers and providers and will act as a disincentive for employers to provide placements. Furthermore, the question of what happens if an employer fails an Ofsted inspection is not addressed.

Question 12:

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

This question gives rise to questions relating to the broader issue of the value of T levels vis-à-vis Apprenticeships. If a learner completes a T level, not only will they be less well qualified than an Apprentice who has two years' on-the-job training, but the learner has not been financially compensated beyond expenses. Why therefore would a learner consider T levels a viable option, given the choice?

Question 19:

Where there are additional occupation-specific requirements that can be delivered or assessed off the job, do you agree that these should be incorporated into T levels? If not, why not?

We agree that occupation-specific requirements that can be delivered or assessed off the job should be incorporated into T levels but that funding should be made available for this consideration as the learner therefore has greater employability prospects.

Additional Questions arising:

- Under the section laying out the principles of the T level programme, the consultation document states the intention that the Department wants students who complete T levels “to be able to move into apprenticeships at level 4 and above, or progress to further specialist technical qualifications at higher levels or higher education. This is discussed further in section 3.” This raises the question as to whether entry requirements for Trailblazers will therefore need to be revisited – or will this be done as standards are reviewed on their 3 year cycle?
- Matching Employers’ skills needs is a critically important element of T levels. Under the section relating to the *Employer-led T level panels* it is stated that T level panels “will ensure that the outline content meets employer expectations so that a student has the skills needed to secure skilled employment.” No detail is given as to how this will happen and whether only employers sitting on these panels will have a say as to what constitutes employer need. Understandably, this is a cause for concern as it will result in a narrow and incomplete perspective.
- Although the consultation states that achievement of threshold competence “signals that a student is well-placed to develop full occupational competence, with further support and development, once in employment” and that threshold competence “is as close to full occupational competence as can be reasonably expected of student studying the qualification in a classroom-based setting (e.g. in the classroom, workshops and simulated working environments)” this means that employers will still have to train individuals who have undertaken T-levels. Why would employers ever take students with T-Levels if they could instead recruit apprentices who are occupationally competent?

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