



Association of
Employment and Learning
Providers

AELP Submission: #52

**Consultation on Ofqual's approach to
regulating Technical Qualifications**

02 August 2018

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Introduction

AELP supports the underlying proposition behind T Levels, to create a high-quality classroom-based technical learning option that employers will value in potential recruits, and from which individuals can benefit not only in terms of their career prospects, but in terms of their general learning and development. We seek to act as a critical friend to the policy – supporting it where appropriate and challenging it where necessary with a view to making the final output as good as it can possibly be for all those affected.

We are concerned at some aspects of the implementation of the policy, and in particular (with regard to the remit of Ofqual):

- The compressed timetable which gives a higher priority to political expediency than it does to ensuring that reforms are well-designed and thought-through
- The policy of single licensing of T Level technical qualifications, which appears to be a solution in search of a problem.

In this consultation we have offered responses to a selection of questions in which we believe our members as a whole have a particular interest or a clear view. Where questions are beyond our remit we have returned a “No comment”.

Summary of response

AELP are supportive of the principles behind the creation of T levels. We believe there should be a stream of high quality classroom-based technical learning provision that can seamlessly link to further learning and employment; that meets the needs of potential employers and thus offers meaningful carer prospects to learners. In terms of Ofqual's proposed role in T levels, we also fully support the value of having a single body with overarching responsibility for external quality assurance.

We are however concerned at some of the proposals for implementation, and in particular its pace considering the substance of the proposals being put forward and changes being put in place. The timescale for this consultation – four weeks, and over the summer holiday period – is clearly designed purely to fit a government timetable, not to give the chance of a full consideration and input of the proposals being put forward. Considering the intent that these changes should be for the long-term, there is an unseemly hurry on the part of the government to put everything in place, which only works against the interests of the first cohorts of learners in particular.

In general terms we are supportive of the positions Ofqual is taking regarding regulation of the Technical Qualification, though we do have some specific concerns, the key points of which we have outlined in summary below:

1. There is nothing inherently wrong with the differential of presenting T Levels as bringing learners up to the level of getting a job, and apprenticeships progressing them to full occupational competence. To conflate the two as having some sort of equivalent value merely confuses users and devalues one or other, if not both, streams of provision. (Q1)
2. It is imperative that there is a clear and common terminology and there is still considerable work to do on this front at departmental level – if the sector itself is still unclear, there is little chance that employers and learners in general more widely will fare any better. (Q5)
3. If the policy is to design a new stream of technical provision, then the opportunity should be taken to incorporate new models of thinking and delivery. There is no inherent reason why T-levels should not be able to be delivered on a roll-on roll-off basis, but fixing assessments to a very limited number of windows and preventing formative assessment from happening are two examples of where the proposals merely ensure the possibility of roll-on roll-off provision is (at best) impeded, and (at worst) prevented. (Q11)
4. We fundamentally disagree with the proposal to limit assessments and retakes to one period in May/June. Where learners are in a position to be assessed earlier in the year there should be an option to allow this to happen – to make them wait unnecessarily offers no benefit to anyone. (Q12 and Q14)
5. Having two different grading systems within the components of the Technical Qualification makes the process of aggregation towards an overall T-level grade somewhat more difficult than it needs to be. We believe that both the core and specialism element should be graded on a Pass/Merit/Distinction basis. (Q19)
6. The proposal to allow the certification of Technical Qualifications offered outside England on a standalone basis is completely illogical and unfair if it is not to be allowable for English

students as well. Overall, it is difficult to believe that a qualification that is expected to equate to nearly three A-levels and could take in excess of two years and 1400 hours to complete, has no inherent value worth certificating. If this is the case, one wonders why anyone would want to take it at all. (Q23)

7. We have concerns that setting preconditions of forms of assessment for the design of content is misplacing priorities. The form of examination should be relevant to the content, not the other way around. (Q30)
8. It must be questionable whether removing the need for an awarding organisation to establish whether or not the qualification they are designing or offering has or meets a clear objective is a wise move. (Q38)
9. We are concerned that in trying to minimise the burden that introducing new provision will entail, the tone of the proposals overall ends up reinforcing the status quo rather than providing room for innovation. We are particularly clear that delivery of T levels on a roll on-roll off basis should at least be trialled, and certainly not precluded by regulations for no good reason. (Q52)
10. We are concerned that the numbers of learners coming through in each cohort will have an impact on grade boundaries for each. The premise for assessment comparisons between years is that each cohort does not substantially differ in its characteristics from the last. However, with such potentially small numbers taking each of T levels (particularly in early cohorts) then it is perfectly possible that the characteristics of each cohort could be very different, particularly if the uptake of the T level grows substantially from one year to the next. This will undoubtedly provide some challenges in ensuring that standards are maintained from one year to the next, from one cohort to another. (Q52)

Detailed response

1. Do you have any comments on the way that the purpose for Technical Qualifications which we propose to set out in our Qualification Level Conditions document is described?

In general terms the description is sound. However, there is some issue with the expectation as described by the DfE that T Levels should enable learners to get a job (threshold competence) with the Ofqual expectation that this level is “as close to full occupational competence as possible”. We do not anticipate that a T-level will ever provide full occupational competence – after all, an apprenticeship will only deliver this after a minimum period of employment of one year, which a T Level by definition cannot provide – so aiming for a level of threshold competence that is very close to full occupational competence merely ends up devaluing apprenticeships. (Why, for example, would employers wish to employ someone for eighteen months get them to full occupational competence via an apprenticeship when they could recruit a T-level learner who is already very close to it?) T levels will play an important role in providing underpinning knowledge and theory, in building industry awareness, and providing an applied learning environment for those getting ready for employment and this should not be underplayed by attempting to somehow conflate them with apprenticeships or any other form of learning – they should have an inherent value of their own

There is nothing inherently wrong with the differential of presenting T Levels as bringing learners up to the level of getting a job, and apprenticeships progressing them to full occupational competence. To conflate the two as having some sort of equivalent value merely confuses users and devalues one or other, if not both, streams of provision.

2. To what extent do you agree or disagree with our proposal to set a requirement that Technical Qualifications are assessed through a Core and Occupational Specialism(s)?

This appears reasonable. A balance must be struck however between the proposed numbers of occupational specialisms and the ability of the sector to service them

3. To what extent do you agree or disagree with our proposal to set a requirement that core knowledge and understanding, and core skills are assessed separately?

This seems sensible and gives an option of transferability across sectors through the recognition of prior learning. However, it must be recognised that these are not totally separate items, as knowledge is often evident when learners perform skills – a failure to take this into account will merely reinforce the traditional division of academic exams and practical skills rather than seeking a new way forward.

4. To what extent do you agree or disagree with our proposal to provide guidance on the relative weightings of core knowledge and understanding and core skills within the Core?

No comment.

5. Do you believe that 25-40% is an appropriate weighting for the assessment of core skills within the Core?

This seems reasonable.

However, at Ofqual's consultation event in London there was an emerging issue of terminology, whereby there was confusion about what was being referred to – it took some debate to understand that the 25-40% range for core skills within the Core, was different to the 20-50% range for the Core skills element as part of the T Level overall. Initially some, (including Ofqual staff) thought that the 25-40% range was Ofqual narrowing the 20-50% range for the Core skills element proposed by DfE, rather than it being an entirely different measure.

This use of language, and particularly similar terms to describe different things, is an issue across T Levels generally and is not confined to the Ofqual consultation. There is still for example confusion about “routes” and “pathways” and the levels to which these refer. It is imperative that there is a clear and common terminology and there is still considerable work to do on this front at departmental level – if the sector itself is still unclear, there is little chance that employers and learners in general more widely will fare any better.

- 6. To what extent do you agree or disagree with our proposal to set a requirement for awarding organisations to specify combinations of Occupational Specialisms that may, or may not, be taken into account?**

No comment.

- 7. To what extent do you agree or disagree with our proposal to set a requirement for Occupational Specialisms to be assessed separately to one another?**

We agree. Specialisms should have different questions and therefore be set and sat separately.

- 8. To what extent do you agree or disagree with our proposal to put in place guidance that where possible, performance outcomes within a particular Occupational Specialism should be assessed together?**

We agree, but where this is not possible it should not act as a barrier to achievement.

- 9. To what extent do you agree or disagree with our proposal to set requirements and guidance on the titling of Technical Qualifications and Occupational Specialisms?**

We agree. Ofqual should define the titles for geographic consistency and ease of communication.

- 10. To what extent do you agree or disagree with our proposal to set requirements or guidance on the number of assessments for Technical Qualifications?**

We agree with the proposal to expect the minimum number of assessments to promote integration, whilst maintaining manageability. This reflects a balance between flexibility and rigour.

11. To what extent do you agree or disagree with our proposal to set a requirement that the whole of the Core should be assessed together and the whole of each Occupational Specialism should be assessed together?

We disagree with this proposal as it is defaulting to the rigidities of the current models of academic year provision. If the policy is to design a new stream of technical provision, then the opportunity should be taken to incorporate new models of thinking and delivery. There is not, for example, any inherent reason why T-levels should not be able to be delivered on a roll-on roll-off basis, but fixing assessments to a very limited number of windows and preventing formative assessment from happening merely ensures roll-on roll-off provision is (at best) impeded, and (at worst) prevented.

12. To what extent do you agree or disagree with our proposal to set a requirement that all assessments for Technical Qualifications should take place in May/June?

We fundamentally disagree with this proposal, in part referring to our previous answer regarding its reinforcement of the existing system as opposed to allowing innovation in delivery. There is also the pressure this would put on students at a time of increasing concern about mental health issues on the young, and the overload on the delivery infrastructure in terms of the sheer numbers of exams across all streams of provision that would be taking place simultaneously.

The proposal does also not sit well with the DfE proposal that industry placements should be arranged at provider/employer level. Given the pressure on the supply of industry placements there will inevitably be, it would not be sensible to impose a condition that effectively means that up to two months of the year cannot be used to put them in place, because this is the only exam period that is available.

There is also the issue that if there is only one series of assessments in a year, then planning for a task cannot be assessed – only evaluation of the planning that has already been done. Limiting the windows for sitting examinations therefore may well impact on the robustness of the assessments themselves.

Where learners are in a position to be assessed earlier in the year there should be an option to allow this to happen – to make them wait unnecessarily does not offer any benefit to anyone.

13. To what extent do you agree or disagree with our proposal to set a requirement that where a student is proposing to retake, they must retake the whole of core knowledge and understanding, and/or the whole of core skills, and/or the whole of an Occupational Specials within the Technical Qualification?

This rather depends on what the learner is being asked to do in order to retake, and how far away from a pass they are.

If for example they have undertaken an employer-set project over a period of time, or compiled a substantial portfolio of work, it is unclear what benefit would accrue for forcing the student to redo the whole project, or to undertake a whole new one. If anything, this is likely to be highly demotivational. A project or portfolio reflects formative learning – it can be amended and altered over time as new and better examples of work come to hand, for example. This is of course the way that people learn at work; on a formative basis, through trial and error, essentially. To treat this output as a purely summative “all or nothing” assessment is therefore to some extent counter-intuitive and not a reflection of the way in which it was put together, nor of how they would be expected to learn in a work-based setting going forward.

On the other hand, resitting a set examination – as would happen for example with GCSEs, A-levels or indeed Functional Skills – has a clearer correlation to a requirement to do the whole thing again.

We do not therefore have a definite answer to this question beyond noting that it will depend on whether the form of retake required is appropriate for the input that was previously adjudged not to have been of the required standard.

14. To what extent do you agree or disagree with our proposal not to allow an additional assessment series for retakes?

We completely disagree with this proposal. It would be demotivational in the extreme for learners to only have one chance per year to be assessed, and (as noted earlier) would merely entrench the status quo and preclude new models of delivery from being tried. It would also be clearly unsatisfactory for learners who failed exams at the end of their second year to wait a further year to have to retake, particularly if the margin of their failure was only incremental. A T level is equivalent to study for three A-levels, and yet if an A-level student fails one A-level they have the chance to retake it in the following November. There is no benefit to anyone in denying this opportunity to T level learners for whom the stakes relating to the examination are three times higher; certainly it is not something that employers would understand.

The alternative approach of offering dedicated retake windows outside of the main assessment summer window would be an improvement on the current proposals of no retake windows at all beyond the May/June timeline – but in reality this would merely mitigate the damage of a badly thought-through policy. It would not deal with the real issue that limiting examination windows in the ways proposed does not align well with what is supposed to be employer/industry-led technical/vocational learning provision.

15. To what extent do you agree or disagree with our proposal to set a requirement that awarding organisations should provide schools, colleges and students with sufficiently detailed information about performance on which to base a decision about whether to retake a part of the Technical Qualification?

In principle, we agree. It is however on the face of it difficult to see how granular such detail can be on the Occupational Specialisms that use Pass/Merit/Distinction gradings. Awarding organisations should certainly however give timely feedback reports to individual centres focusing on why levels were not met, otherwise the system itself never learns.

- 16. To what extent do you agree or disagree with our proposal to put in place a requirement that where an awarding organisation ceases to make a Technical Qualification available, it must ensure that arrangements are in place to allow students to retake their assessments?**

We agree with this. In fact, it is another reason not to limit retake windows in the way that is currently proposed.

- 17. To what extent do you agree or disagree with our proposal to put in place a requirement for an Awarding Organisation to recognise prior learning in Technical Qualifications, where this is possible?**

The recognition and incorporation of prior learning can be an important part of any learning experience. However, we are unsure that it is the place of Ofqual or anyone other than those with expert knowledge of the industries involved to adjudge whether, or to what extent, prior learning (where it exists) should be accommodated in the case of each T level, as occupational scenarios will be almost infinitely variable to the extent that is unlikely one rule will fit all. We see no reason therefore to change the current approach of the General Conditions which makes no requirement either way.

- 18. To what extent do you agree or disagree with our proposal to set a requirement for the Core (core knowledge and understanding and core skills) to be reported as a single grade on a scale of A*-E?**

No comment.

- 19. To what extent do you agree or disagree with our proposal to set a requirement for Occupational Specialisms to be reported against a grading scale of Pass, Merit and Distinction?**

No comment.

On a general note however, we would comment that having two different grading systems within the components of the Technical Qualification makes the process of aggregation towards an overall T-level grade somewhat more difficult than it needs to be. Whilst we believe the competency elements can only be on a Pass/Merit/Distinction basis, the knowledge elements could be done either this way or by A*-E grading. Whilst appreciating the difficulties therefore, we believe that both elements should be graded on a Pass/Merit/Distinction basis.

- 20. To what extent do you agree or disagree with our proposal that we should set a requirement for Occupational Specialisms to have a "Working Towards" grade below pass?**

We disagree with this proposal.

Without a Pass, the learner's work has no aggregated value because the final T level cannot be attained. The presentation of a transcript to a potential employer of "Working Towards" elements will still equate to a failure to complete and therefore is of no benefit. By arguing it has a benefit, the argument is being made that failure grades should be differentiated, which goes against the whole precept of A*-E (pass) and U (fail), or Pass/Merit/Distinction and fail. Introducing such a grade band therefore undermines the intellectual coherence of the whole policy.

What will be of benefit – referencing our response to question 15 above - is that there should be detail of the marking system that allows a learner to see how close or otherwise they were to a Pass so a suitable judgement can be made about whether or not to retake. The factors leading to these scores will be very individual and not best subject to a rigid "one size fits all" banding that will only allow those with a certain score to retake. It is however difficult to see what granularity can be used on a Pass/Merit/Distinction to judge whether or not a learner has only fractionally missed a grade boundary.

At the Ofqual consultation event, a suggestion was made that the "Working Towards" grade should be awarded to those within a range below a Pass, equivalent to that of the difference between Pass and Merit. This would almost inevitably mean a very large proportion of learners would be caught by the "Working Towards" grading, and thus it would lose any meaning.

There appears to be no reason however why individual providers could not use "Working Towards" as a part of their narrative for learning delivery – but we do not believe it should be a regulated part of the qualification within the remit of Ofqual.

21. To what extent do you agree or disagree that we should put in place guidance for Occupational Specialisms regarding how assessment design must take into account this grading model?

No comment.

22. To what extent do you agree or disagree with our proposal to provide guidance on Condition H6 in respect of Technical Qualifications?

We agree with this proposal.

23. To what extent do you agree or disagree with our proposal to disapply Conditions I3 and I4 in respect of Technical Qualifications taken as part of a T level?

The proposal to certificate Technical Qualifications offered outside England on a standalone basis is completely illogical and unfair, and we fundamentally disagree with it if it is not to be allowable or English students as well. Under these proposals, it would for example be possible for a provider in Swansea to offer certificated standalone Technical Qualifications, whilst a provider in Hereford could not. It would mean that foreign students are able to provide evidence of valuable classroom-based technical training, but English students who have done the same course cannot.

Either there is value in a Technical Qualification on a standalone basis or there is not, and this proposal just highlights the view that the department themselves do not seem completely clear on what value a technical qualification has, or if it has any at all. In our view it is difficult to believe that

a qualification that is expected to equate to nearly three A-levels and could take more than two years and 1400 hours to complete, has no inherent value worth certificating. If this is the case, one wonders why anyone would want to take it at all.

As discussed in the consultation at paragraph 6.10, a refusal to issue any recognition of a Technical Qualification in isolation may well impact adversely on disabled students who find (for example) that even with support they were unable to complete the work placement element because of the nature of their condition. This would be compounded if nevertheless such recognition were available to an able-bodied learner who happened to sit the qualification on a stand-alone basis outside of England.

This proposal is presumably an attempt by the department to ensure that the bulk of providers encourage learners to complete the whole qualification, whilst not losing the opportunity to exploit export earnings potential of Technical Qualifications from foreign education systems which do not share the same list of overall requirements as England. This is a very cynical and blunt approach, because there are other ways to do this if this is what is intended - for example through the levers of funding or performance management. To take the approach that has been suggested merely punishes English learners in an attempt to ensure the policy is seen as working, instead of designing a proper programme that gives all learners the opportunity to have their learning and dedication recognised.

24. To what extent do you agree or disagree that we should require Technical Qualifications to be accredited?

We agree.

25. To what extent do you agree or disagree that we should require Technical Qualifications to meet our existing accreditation criterion?

We agree.

26. To what extent do you agree or disagree with our proposal to require awarding organisations to put in place and comply with an assessment strategy covering the areas described?

We agree.

27. To what extent do you agree or disagree that we should require awarding organisations to explain through their assessment strategy, their approach to covering the outline content?

We agree. Clear information for providers is always very welcome.

28. To what extent do you agree or disagree with our proposed approach to put in place guidance on the development of assessment objectives for core skills?

We agree. Clear information for providers is always very welcome.

29. To what extent do you agree or disagree with our proposed approach to setting assessment objective requirements for core knowledge and understanding?

We agree. Clear information for providers is always very welcome.

30. To what extent do you agree or disagree that we should set a requirement for core knowledge and understanding to be assessed through Assessment by Examination?

We have no objection to Assessment by Examination as a principle, but we do have concerns that setting this as a precondition for the design of content is misplacing priorities. The form of examination should be relevant to the content, not the other way around.

31. To what extent do you agree or disagree that we should require awarding organisations to set assessments for core skills?

32. To what extent do you agree or disagree that we should require awarding organisations to set assessments for occupational specialisms?

We agree with both proposals.

33. To what extent do you agree or disagree with our proposal to set a requirement for core knowledge and understanding to be marked by the awarding organisation?

If core knowledge and understanding is to be assessed through Assessment by Examination, then there seems no reason to change the approach regarding its marking.

34. To what extent do you agree that we should require core skills assessments to be marked by the awarding organisation?

35. To what extent do you agree that we should require Occupational Specialism assessments to be marked by the awarding organisation?

Clearly this would be less burdensome on the provider and reduce the need for moderation by the awarding body. However, the awarding body will still be conducting periodic QA visits to the provider during the period of teaching in the absence of moderation visits, so the offset this would provide is probably questionable. There is some concern as to how Awarding Organisations would deal with large numbers of portfolio-based submissions at one time, but on the other hand there are existing processes in place that deal with this which could presumably come into play. On balance we would probably agree with the proposal, but there are clear advantages and disadvantages on both sides of the argument so it must be said that (providing appropriate funding was in place to facilitate this) we do not have a strong view in either direction as to who should undertake marking.

36. To what extent do you agree or disagree with our proposal to put in place assessment controls for core skills and Occupational Specialisms?

No comment.

37. To what extent do you agree or disagree with our proposal to put in place requirements for awarding organisations in relation to reviews of marking and appeals?

We agree.

38. To what extent do you agree or disagree with our proposal to disapply Condition E1 in respect of Technical Qualifications?

It must be questionable whether removing the need for an awarding organisation to establish whether or not the qualification they are designing or offering has or meets a clear objective is a wise move. Whilst ultimately it may be the IfA or DfE that would determine this through its commissioning and procurement of the qualification, it is not unreasonable for Ofqual to be assured that the Awarding Organisation is itself aware of, understands and is in agreement with the objective.

39. Are there any other General Conditions that we should disapply in respect of Technical Qualifications?

No comment.

40. To what extent do you agree or disagree that we should provide Technical Qualification-specific guidance for conditions D3 and E7?

No comment.

41. Are there any other General Conditions against which we should provide Technical Qualification-specific guidance?

No comment.

42. To what extent do you agree or disagree with our proposed approach to setting and maintaining grade standards in the Core?

No comment.

43. To what extent do you agree or disagree with our proposed approach to setting and maintaining grade standards in the Occupational Specialism?

No comment.

44. We have set out the ways in which our proposals could impact (positively or negatively) on students who share a protected characteristic. Are there any potential impacts we have not identified?

We are particularly concerned at the scenario outlined in paragraph 6.10 whereby a disabled student who was unable to complete a work placement due to the nature of their condition, may therefore no recognition at all of their completion of the Technical Qualification. Please also refer to our answer to question 23 above.

We also share the concern that the limitation of examination windows and retakes to one point in the year may unfairly disadvantage a number of those with protected characteristics.

As noted in our response to question 20 above, we do not believe a “Working Towards” grade will provide any benefit to any group. It would not be of benefit to LLDD learners on the basis that if suitable support has been put in place during the learning period, then they should be “competing” on an equal basis to their non-disabled counterparts, and the “Working Towards” grade would therefore have no more meaning for one group over another.

45. Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on students who share a protected characteristic?

46. Do you have any other comments on the impacts of our proposals on students who share a protected characteristic?

The best mitigation of some of the proposals – as outlined in the previous response – would be not to implement them at all.

47. What do you anticipate the additional burden and cost to be of permitting an additional retake series and of ensuring this was only used for students retaking assessments?

No comment.

48. What do you anticipate the additional burden and cost to be of requiring all assessments to be set and marked by the awarding organisation compared with allowing marking by schools and colleges?

No comment

49. We have set out our view of the regulatory impact of our proposals on awarding organisations offering Technical Qualifications. Do you have any comments on this assessment?

No comment.

50. Are there any additional steps we could take to reduce the regulatory impact of our proposals?

No comment

51. Are there any costs or benefits associated with our proposals which we have not identified?

Consideration should be given to an expectation that employers should have the chance to feed in to assessments, particularly where they relate to activity undertaken on the industry placement. This is of great benefit as employers are clearly important end-users of the vocational education and training system. Further credibility and confidence in the T level can come from employer input, and employer feedback will help see through the process of engagement, investment and responsibility that employers are taking. There may also be a positive impact on the costs of delivery.

52. We have not identified any ways in which our proposals will prevent innovation by awarding organisations offering technical Qualifications. Do you have any comments on this assessment?

Whilst in general terms we are supportive of the positions Ofqual is taking regarding regulation of the Technical Qualification, we do have some specific concerns which we have outlined in detail in our previous responses.

Overall however there is a feeling that in trying to minimise the burden that introducing new provision will entail, the tone of the proposals overall ends up reinforcing the status quo rather than providing room for innovation. The prime example is the limitation of exam windows and retakes to one point in the year, which will all but end the possibility of the development of a T level that could operate on a roll-on roll off basis. Particularly if the intention of T levels is to prepare young people for work, then it seems logical that they should not just be confined to an academic year cycle. With only one start date a year then those that make a poor choice of option initially will be forced to wait an entire year before being able to take up another option. This would not only help numbers and uptake but is likely to fit better with transfers to apprenticeships. There is no inherent reason why roll on-roll off should not be available for T levels but some of the proposals here will work against this possibility. We are clear that delivery of T levels on a roll on-roll off basis should at least be trialled, and certainly not precluded by regulations for no good reason.

Another example is the refusal to issue certificates for Technical Qualifications in their own right if studied in England, but not if followed abroad. This is presumably an attempt by the department to ensure that the bulk of providers encourage learners to complete the whole qualification, whilst not losing the opportunity to exploit export earnings potential from systems which do not share the same list of overall requirements as England. This therefore means that the entire policy is being based on the “here and now” system instead of allowing itself to be amended if necessary to meet the challenges of the future. In a more general sense this is a criticism of the T level policy overall – that its adherence to 15 routes does not allow for a proper sense that future development and innovation can be accommodated – though we realise this line of thinking and commentary is beyond the scope of this consultation.

There are other ways to do this - for example through the levers of funding or performance management. To take the approach that has been suggested merely punishes English learners in an attempt to present the policy as working, instead of giving all learners the opportunity to have their learning and dedication recognised.

We would also note that the numbers of learners coming through in each cohort will have an impact on grade boundaries for each. The premise for assessment comparisons between years is that each cohort does not substantially differ in its characteristics from the last. However, with such potentially small numbers taking each of T levels – we have heard mention of around 11,000 on the early Education T level, 3,000 on the Design and 18,000 on the Digital T levels – then it is perfectly possible that the characteristics of each cohort could be very different, particularly if the uptake of the T level grows substantially from one year to the next. This will undoubtedly provide some challenges in ensuring that standards are maintained from one year to the next, from one cohort to another.



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