

# Ofqual's response to the Government's consultation on the implementation of T level programmes



## Executive summary

1. Ofqual welcomes the Government's vision to transform the technical education system. The T level programme is an important development which has the potential to raise the status of technical education. We are committed to working with Government and the Institute for Apprenticeships (the Institute) to develop and deliver Technical Qualifications (TQ) that meet the needs of learners and employers.
2. The consultation rightly concentrates on the leading role of the Institute, while recognising that Ofqual has a broad responsibility for regulating national qualifications. We are committed to supporting the development of a quality assurance arrangement involving both the Institute and Ofqual. In this spirit, our comments on the consultation reflect that complex judgements will need to be made in order to ensure that TQ approved by the Institute provide sufficient means for us to maintain grade standards. For Ofqual to meet our statutory objectives, we will want to ensure at the outset that qualification design and delivery will support consistent and reliable outcomes without undermining their purpose. One of our key objectives will therefore be to ensure that we develop a single joint process for approving the qualification that meets the needs of both the Institute and Ofqual.
3. We are equally committed to ensuring that the transition from the current suite of regulated qualifications to T levels is conducted smoothly and efficiently, ensuring fairness for learners, schools and colleges. We welcome the opportunity to work with the Department for Education in their review of the wider qualification landscape to secure this critical outcome. Here, we would want to highlight the aggregate challenge of reform and wider changes in the sector and the implications for the system. The consultation considers the review of a wide range of qualifications in addition to the introduction of T levels which will place significant demands on awarding organisations, schools, colleges and learners. We think it is important to consider the education system's capacity for change when considering the sequencing of these potential reforms.

## Background

4. **Qualification purpose.** The consultation reflects that the clarity of a qualification's purpose at the outset is key to generating valid assessments. We agree that this is important and consider that more work needs to be done to define clearly the purpose of the T level. Equally, consideration should be given to how the 'role' of the TQ is described. In particular, it seems difficult to assign 'ensuring comparable standards of performance' and 'supporting fair access' as roles for a qualification. We think that broader issues such as these are more appropriately addressed in the delivery of the qualifications.
5. Our experience reflects that the purpose of a qualification should acknowledge whether they will be used for measuring school and college performance. We know that accountability pressures have implications for how qualifications function and this needs to be factored in before judgements are made about assessment methods and qualification design. Ultimately, the Department might need to consider whether these qualifications should be used in school and college performance tables in the event that their inclusion would distort outcomes to the detriment of their principal purpose.
6. **The standard and qualification subject content.** Our experience working on Apprenticeships reform suggests that there can be some confusion about the use of the word 'standards'. The T level consultation helpfully reinforces that the 'standard' describes the occupation and outcomes which a person is expected to achieve to attain competence. TQ are to be based on these standards. In this context, the 'standard' is analogous to qualification subject content and initial levels of proficiency. From an Ofqual perspective, our focus is on the maintenance of grade standards. Among other things, we seek to ensure that a learner would receive the same grade for a performance wherever, and whenever, they took an assessment.
7. In line with all other qualifications we regulate, Ofqual would not expect to be responsible for deciding the 'standard' and associated outcomes and levels of performance to achieve competence. For TQ, this is properly the remit of employers and the Institute. However, we know that qualification validity and the degree to which we can regulate for the maintenance of grade standards of any qualification is highly dependent on the nature of the curriculum and how well the subject content is specified. We want to support the Institute and Department in this important early stage of qualification development to ensure that the standards and qualification content form a reliable basis against which a national qualification can be consistently delivered.

8. We also think that it is important that content is sufficiently defined before any final decisions are made on assessment strategies or qualification design. We think that it is possible that there will be marked differences between qualifications across the 15 routes. The consultation indicates that 'Awarding Organisations may need to elaborate further on the outline content produced by T level panels'. We therefore anticipate an iterative process of content, assessment and qualification development. We recognise the challenges that this will pose for Awarding Organisations, the Institute and the Department. We are considering all options for how we might best support this work to ensure the development of high quality qualifications in the time available. Nevertheless, our experience of reform suggests that the T level development timeline remains very taut, even against a 2020 timeline.
9. **Assessment design.** Having defined the purpose of the qualification and determined the standards and content, we think that the organisation that secures grade standards over time needs to have direct involvement in establishing overall assessment design. We would want to understand how any proposed assessment approaches allow for the subsequent maintenance of grade standards and do not prohibit or restrict our ability to do so.
10. **Maintenance of grade standards.** Comparability is important to ensure that standards are maintained by a single provider, such that a learner would receive the same grade for a performance wherever, and whenever, they took an assessment. For TQ, it will be our priority to secure the same degree of rigour in terms of comparability as we do for other national qualifications. Our experience of vocational qualifications reflects how important it is to get this right at the outset. This will require new approaches, which may well vary by route, but would all be underpinned by the regulatory levers we have available to us. We are of the view that such an approach is of central importance if TQ are to enjoy the same public confidence as A levels and GCSEs. We will consider carefully the most appropriate approach to maintaining grade standards in these regulated qualifications. As with all qualifications we regulate, our focus would be to ensure sufficient validity and guard against grade inflation, unreliable assessments and thus the award of qualifications to insufficiently skilled people that would serve to undermine policy objectives and employer confidence.
11. For us to maintain grade standards effectively, it will be important for us to understand in more detail the aspirations for qualification grade comparability. We are pleased that there is no intention to assign an overall T level grade, given the technical and operational challenges such an approach introduces. And given the expected differences in qualifications between routes, we assume that there is no intent to maintain grade standards between them. Rather, we expect technical qualification comparability at the route level to relate to the broad level of demand. Within a route, the consultation notes that the first core component of

the qualification could assess knowledge and understanding at the level of a route, pathway or occupational cluster. This suggests that more than one awarding organisation could be responsible for developing and delivering units assessing common content within a route. It will be important to confirm this at an early stage, so that we can consider the challenges of maintaining grade standards of common qualification units, delivered by different awarding organisations, within a route.

12. Our ability to maintain grade standards is a product of a number of factors that apply throughout the lifecycle of the qualification. An important part of this process is to ensure that qualification validity is built in from the outset. Given the importance of these national qualifications, we believe that it is our duty as the statutory regulator to consider them carefully before they are approved for delivery. The Institute has the statutory responsibility for approving the qualifications and Ofqual would need assurance that they could be delivered in compliance with our regulatory framework. We are considering options for how we might achieve this. One option is the introduction of a bespoke and streamlined form of accreditation delivered jointly with the Institute's approval process. To us, this seems to be the most efficient way to allow us to meet our statutory objectives<sup>1</sup> without impediment to the Institute's approval process and subsequent contract management. We are considering all other potential options for a joint process that would give the Ofqual Board similar levels of assurance.
13. **The single provider model.** The consultation includes the decision to proceed with a single provider model for TQ. Ofqual has a statutory objective relating to efficiency of the market and is, to some degree, neutral about whether one or many providers offer particular qualifications, provided that the market continues to function efficiently and users of qualifications are protected in the event of change. We have advised on, and Government is aware of and managing, the risks related to the single provider model. We will take a close interest in transitional arrangements between current qualifications and the T level programme to ensure that learners are not disadvantaged and there is sufficient clarity about the qualification system. We will also look carefully at the impact of this reform programme on the wider regulated qualification market with an aim of mitigating and managing, as far as possible, any resulting systemic risks.
14. **Reform – system capacity.** We think it is also important to recognise the potential scale of reform we are embarking on and the implications for the system. The reform of the Apprenticeship system is in train, but there is still much to do. We are also mid-way through the reform of English and maths Functional Skills Qualifications that will roll out in 2019. And 2018 will see the first awarding of Applied General and Tech Level qualifications that changed

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<sup>1</sup> Relating to maintaining qualification standards and public confidence

substantially in 2016 to meet Government performance table requirements. Against this backdrop, the consultation considers the need to review Level 2 qualifications, Tech Levels, Applied Generals, and Level 4 and 5 qualifications in addition to the introduction of T levels. The wide-ranging implications of these reviews will clearly need careful consideration. Any subsequent reform would place significant loading on the sector. This is not just an issue for colleges and schools; it also has implications for the capacity of the organisations leading the programmes. Recognising the importance of taking a holistic view of the sector, we think it is important to consider the education system's capacity for change in order to sequence the reform of all related qualifications appropriately once they have been reviewed.