

Written Evidence Submitted by Sandwell College (SPEB16)

FAO: Skills and Post-16 Education Bill – Public Bill Committee

Executive summary:

- Evidence is being submitted against Part 1, Chapter 2, Section 7 – Technical education qualifications, ‘additional powers to approve technical education qualifications’.
- This section deals directly with the Government’s post-16 qualifications review at Level 3. The intent of the Bill as written essentially provides the powers to remove funding approval from qualifications that overlap with A levels and T levels.
- The Bill as written provides for the ‘withdraw (of) approval of a technical education qualification’ – the Bill does not provide a definition of these qualifications nor does it direct either ‘The Institute’ or the Secretary of State to define these qualifications on the face of the Bill.
- The tests as set out in A2D2 (3) (a)-(c) provides too broad a scope to defund qualifications without recourse to having statutory guidance in place or a definition of technical qualification in place within the Bill – for example, The Government’s Post-16 Skills Plan (<https://bit.ly/3cZ1CG9>) highlight ‘Applied General’ qualifications (e.g. BTECs) as Academic Qualifications – therefore exempt from being seen a Technical Qualification. However, the Bill provides a blanket approach to the removal of ‘overlap’ with A levels (an academic route) and T levels (a technical route). Therefore, clarity on the face of the Bill is required.
- These tests would also benefit from a focus on the economy within the Bill, requiring the Institute to have regard to the benefits to social mobility, the economy and employers regarding the ongoing value of technical qualifications (of any type) – This test should also align with Chapter 1, Clause 1 on the Bill on Local Skills Improvement Plans; if these plans have been agreed and approved a necessary locally then the removal of funding for qualifications required locally for any age groups will be at odds with the intent of the Local Skills Improvement Plan section of the Bill.
- A2D2 (7) (b) requires strengthening. The Bill states the Institution ‘must consult – such other persons as the Institute considers *appropriate*’ The role of institutions, awarding body organisations and other practitioners is crucial, otherwise challenge to the word appropriate when in Law favours the Institute and provides little recourse for institutions.
- Therefore, the Bill should include reference to Further Education Colleges, Sixth Form Colleges, Secondary Maintained Schools, Academies and Awarding Body Organisations. Their inclusion also recognises the voice of students through their practitioners which is critical. It should also be noted that the role or practitioners in institutions is similarly informed by the Local Skills Improvement Plans (as outlined in Chapter 1, Clause 1 (4) (7) of the Bill)

- A2D6 (6) requires the Institute to publish information about matters that it considers when deciding whether or not to approve a qualification (section a) or withdraw approval (section b). The clause as written, or no other aspect of this section of the Bill, outlines a right of appeal. Clearly articulating an appeal process and the potential for independent review of decisions is critical.
- A2D9 Moratorium on further approvals under section A2D5 provides broad powers to the institute which may limit student choice or restrict employers from accessing skills. Clause 1, allows the Institute to determine there is a “an appropriate number of approved technical education qualifications of a particular kind”. This then allows the institute to put in place a moratorium on future approvals.
- A2D9 does not recognise the changing needs of the economy and the development of new technologies, modes of working, skills and emerging skills gaps. To apply a moratorium does not benefit the wider economy; the clause only serves to limit the number of qualifications to ensure that T levels and A levels to become the “qualifications of choice” (as stated in the Government’s consultation response). Section 4 then allows the Institute to end a moratorium (which indicates the tenuous need for one in the first instance), but Section 6 requires Secretary of State consultation which will prove bureaucratic and not responsive to economic need. Indeed Chapter 1, Clause 1 (Local skills improvement plans) (2) and (7) (i)- (iii) recognise the importance of local decision making and responsiveness to employers and the needs of an area. A national moratorium could undermine the intent of the Local Skills Improvement Plans
- A2D9 requires reference to what tests or measures the institute would apply to determine ‘an appropriate number’. The Institute should also have regard to the financial impact on Colleges and other providers in making its decisions. The Bill creates explicit obligations on the Institute and Ofqual to co-operate when exercising their respective functions in relation to technical education. Similar obligations should be made with regard to the Institute and the Education & Skills Funding Agency (Department for Education). This is to prevent institutional instability and the wider implications this has on the financial strength of an institution, like a College, has to respond to local needs like a Local Skills Improvement Plan or for local authorities to maintain sufficient and adequate provision for
- Young people as determine by Under Sections 15ZA and 18A of the Education Act 1996 (as inserted by the ASCL Act 2009), which requires institutions to cooperate with local authorities to ensure sufficient suitable education and training opportunities to meet the reasonable needs of all young people in their area. Reducing choice and destabilising will impact on ‘all young people’.
- A2D9 (7) (1) approved “technical education qualification” means a technical education qualification that is approved by the Institute under section A2D3 or A2D5 – is insufficient given that Applied Generals are a different type of qualification that provide a different type of educational experience - one that combines the development of skills with academic learning hence the need for further clarification. Hence the needs for clarification on the use of the term technical education on the face of the Bill.

Introduction and context for evidence submission:

Sandwell College is the largest deliverer of Post-16 Education in the West Midlands. We deliver to over 6,500 16-19 year olds and have 3,500 young people at Level 3, of which 1,300 study A levels (a third of which follow a combined routeway with an Applied General qualification) and 2,200 following a pure Applied General route. Over 1,000 of these students also follow an English and/or Maths GCSE with 77% of them progressing into Higher Education.

Statements made publicly by Officials as the Bill has progressed through the Lords to its present Committee Stage in the Commons appear at odds with the evolving policy and the attached document highlights these discrepancies and what can only be interpreted as potentially misleading information and advice being provide to MPs and Ministers – therefore the Bill and its implementation needs greater clarity.

We are rightly concerned that the response from Department for Education explicitly in both the first and second consultation documents **states** that **full BTECs** (and other qualifications) which are essential for progression will become '**rare and only those that are small would survive**' – therefore the clauses on the Bill pertaining to the role of the Institute have been prejudged and the Bill in its present form does not offer sufficient protections or transparency for students, parents and institutions of a set of qualifications studied by more than a quarter of a million young people every year.

We're pleased to enclose this evidence for your consideration. The submissions have been created based upon the practitioner-led experiences of Sandwell College as the qualification reforms have been announced and subsequently rolled out. The submissions highlight inconsistency of message and how this lack of clarity and understanding is also evident in the clauses of the Bill referenced here.

Recent announcements by Ministers in relation to the reforms of the Level 3 qualification landscape indicate that the process to date has not fully considered the weight of evidence and experiences which institutions can provide. Institutions like Sandwell College seek to strengthen the reforms and we trust the evidence provided and the suggested amendments/mitigations will prove helpful to the Committee in its scrutiny of the Bill.

Evidence Section:

Qualifications, T Levels and Work Placement feedback and suggested improvements

Executive Summary

The proposed changes to the 16-19 educational system are profound and have a number of positive aims. However, to ensure they are effective for young people their implementation needs to be carefully thought through and planned to achieve a positive outcome.

As the largest provider of 16-19 study programmes in the Midlands we have been carefully considering how the proposed changes as they currently stand might impact and have considered what changes to proposals would benefit students.

Key Messages

The College is very supportive of changes that recognise the need for high-quality education and training post 16. The Government is recognising the key role colleges can play as an anchor role in their communities.

To support these developments the College has given thought as to how change can best be implemented to lead to successful reforms. The comments are based on practitioner knowledge, expertise and experience. Above all the College wants the best possible outcomes for its students.

The new T levels have the potential to offer a new route into careers and skilled employment and sit alongside other routes such as A levels and Applied Generals. The increased working with employers is something as a College we fully support.

Our commitment is illustrated by our investment plans. Working with partner organisations, we are investing £6m in initial pathways and have proposals developed with partner organisations for a further £30m into upgraded facilities.

We have invested heavily in engagement staff far beyond the Capacity Development Funds we have received.

We are developing innovative approaches which we would like to share and obtain department support.

For such changes to work successfully they need to be collaborative with real practitioner involvement and for practitioner views to be heeded.

The current proposals do not fully implement the Sainsbury review which clearly did not advocate the removal of the reformed Applied General Qualifications. Due to their increased rigour, Sainsbury clearly viewed them as an academic pathway which is both borne out by our institution and by national experience.

If the changes are implemented as described it will reduce access to education by some of the most disadvantaged young people in the country, it will disproportionately impact upon BAME learners and it will impede social mobility.

About Sandwell and our College

The College is comprised of three campuses: Central Campus, which focusses on the vocational offer for Sandwell; Central St Michael's, the A level centre for Sandwell, and Cadbury College, providing A level and vocational provision at both Level 2 and Level 3 in Kings Norton. Cadbury College merged with Sandwell College in November 2018. It has enrolled over 7000 students so far for 2021/2022.

Sandwell has very high levels of deprivation, which is widespread and uniform. The worst areas of deprivation tend to follow Sandwell's industrial belt running from the North West to the South East of the borough. In 2015 (recast to 2019 LAD boundaries), indices of multiple deprivation (IMD) show Sandwell's average deprivation score as ranked the 12th most deprived local authority in England out of 326. IMD results show that Sandwell's position has deteriorated relative to other districts in England; Sandwell was 16th in 2004 and 14th in 2007. 60% of residents live in 20% of the most deprived households.

In terms of income deprivation, it is the 2nd most deprived borough in the UK. In absolute terms, health in Sandwell is improving but at a much slower rate than the rest of the country.

Life expectancy in Sandwell is lower than in the rest of England; 74.9 for men and 80.7 for women compared to 78.25 and 82.3 nationally.

Unemployment and worklessness in Sandwell is higher than the national average with 5.3% unemployment against 3.1% nationally prior to the pandemic. The average salary in Sandwell is £30,700, which is lower than the UK average of £37,400 and the Birmingham average of £37,200.

Achievement rates at age 16 have declined year on year in Sandwell and remain low compared to the rest of the country, with 47% of students leaving school without a good GCSE in Maths or English. 35% of 16-74-year-olds in Sandwell do not hold formal qualifications, which compares to 26% in the West Midlands and 22% across England.

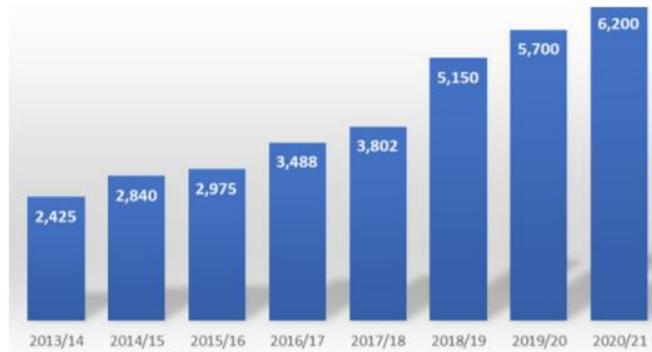
Our College

Sandwell College is the largest deliverer of provision for 16-to-19-year olds in the West Midlands. The College achievement rate for young people was 86% overall in classroom activity compared with a national average of 83.4%. for adult education the comparable rate was 92.2% in College compared with 89.9% national average.

The College has a turnover of approximately £42 million and employs over 650 staff.

The College has seen an unprecedented growth in student numbers. The school attainment within our travel to study area sees only 46% of school leavers achieving 5 GCSEs A*-C; meaning around 2,500 students are studying maths and/or English.

We have 1,250 A level students, around 30% of whom have an applied general/A level combined routeway recognised by universities. The remainder our Level 3s, c2,200 students following Applied General routes.



It is critical to note that the majority of Level 3 students within College have progressed from Levels 1 & 2. All of whom follow carefully planned vocational pathways with the existing curriculum structure which has enabled this to happen.

Main impacts of proposed changes following the review of post-16 qualifications at Level 3- Second Stage Consultation

- 1. As proposed there will be a catastrophic reduction in students being able to study post 16 and it will impact most on those who are most disadvantaged and BAME students. Social mobility will be setback in an unprecedented manner.**
- 2. The consultation documents fail to acknowledge sector support for the retention of high quality Applied General Qualifications, the value they have and the impact that their removal would have on social mobility and progression to HE.**
- 3. The stability of colleges and the ability to implement a change of this scale in a such a short amount of time. With the reduction in students being able to study an appropriate course Post 16 there will be less income at for colleges. Less income results in less investment in the local economy and undermines the key role that many colleges play as an anchor institution and this will impact the society colleges serve, will increase social issues and NEETs, will decrease the skills and reduce the ability to promote improvement.**

These key impacts are discussed further below:

- 1. As proposed there will be a catastrophic reduction in students being able to study post 16 and it will impact most on those who are most disadvantaged and BAME students. Social mobility will be setback in an unprecedented manner.**

T levels are designed to be different from existing qualifications with differing technical emphasis. This is highlighted in both the DfE documents and specifications. The nature of T levels with much larger programmes and work experience will result in significantly more stringent entry requirements as the size of programme will not facilitate resit of maths and/or English. The outcome needs a maths and or English pass at Level 2 for the T level to be achieved.

The T level is much larger than existing study programmes at 1800 hours it is not practical to successfully add GCSE on top, as a minimum this would be up to 140 -150 hours per annum with more through tutorial work.

The T level is also seeking parity of esteem as an advanced qualification mirroring at a technical level to A levels and therefore, given this, the entry requirements will need to be similar. Indeed, this is currently the case for Wave 1 providers who are setting Grade 4 and above entry requirements in many instances and it is our own judgement on entry criteria needed based on the standard required within the T level specifications currently available.

The T level is more akin to an apprentice standard rather than a qualification in its own right this is fundamentally different to the Applied General Qualifications which are qualifications in their own right.

It has been suggested that the transition programme may support students who are not ready. However, this is a single year compared with students being able to study for 2-3 years. A single year is not sufficient and will not remove the issue of maths and English barriers.

The current plans will lead to reduced progression opportunities and fewer students being able to access level 3 programmes. Currently national rates stand at around 30% English and less than 20% for maths in terms of resit. The corollary of this is that there will be reduced access to Level 3 which is inherently logical but not reflected in the DfE impact assessment and clearly contradicts the asserted aim of social mobility. At Sandwell, the consequence will be increased NEET levels locally with a disproportionate impact on BAME learners.

Whilst we are not able to comment on national implications, the forecasted outcomes in the table below could be extracted to create a worrying national picture impacting many more than the 4% mentioned in the consultation documents.

The total number of students who would no longer be able to study at the College is broken down in the table below:

Row Labels	Students without GCSE Maths and/or English	BAME	White British
Animal Care	21	19.05%	80.95%
Business Studies	139	96.40%	3.60%
Computing	58	91.38%	8.62%
Engineering	15	93.33%	6.67%
Health & Social Care	248	85.48%	14.52%
Performing Arts	70	60.00%	40.00%
Photo Imaging	78	65.38%	34.62%
Public Services	65	80.00%	20.00%
Sport	178	79.78%	20.22%
Travel	61	80.33%	19.67%
Combined Sixth Form	85	84.71%	15.29%
Grand Total	1018	81.04%	18.96%

**The above figures breakdown into the following White British and BAME classifications*

2. The consultation documents fail to acknowledge sector support for the retention of high quality Applied General Qualifications, the value they have and the impact that their removal would have on social mobility and progression to HE.

The number of AGQs offered by colleges is similar to the number of A Levels that are offered and from a student perspective are not confusing as implied in the consultation which refers to 12,000 qualifications. Existing reforms have already made AGQs more rigorous qualifications with more exam content. Even in their reformed state, these routes suit the learning styles of a broad range of students.

Of the 1081 students mentioned in the table above, progression into Higher Education was as follows;

- Sandwell College: 70%
- Central Saint Michael's Sixth Form: 83%
- Cadbury Sixth Form College: 74%
- Those students following a combined A level/AGQ route progression was 77%

It is clear from national statistics and the information from our own college that due to lower GCSE scores, students find the Applied Generals a more accessible route to Higher Education. Different does not mean inferior in meeting the student goals.

The new T levels have a clear view on progression to employment it is difficult to see how they can lead to the same higher education pathways for the young people involved if they wish to pursue higher study as a progression at 18. The occupational focus would restrict access to degree programmes.

It is also the case, that the AGQ route offers a life-changing routes into HE for many students from BAME or low-income households who have no history of higher education, and aspiration. The wholesale change will reduce purported social mobility for many. AGQs that primarily lead to university are Engineering, Health, Sport, Business Studies, Performing Arts, Applied Science, Art, and Travel and Tourism. These are a small number for consideration for retention. A name of a qualification does not imply overlap. There are also AGQ routes into certain professions at higher-levels, including public services.

The response to many of the representative bodies and expert practitioners from colleges appears not to recognise the richness and complexity of learner choice and tries to create simplicity where simplicity does not lead to the optimal outcomes.

The College has a large number of students following a programme of A level and AGQs which is not only specific to the ultimate career sector they wish to follow but also recognises that entry-level into those professions is at Level 6 and therefore further study would be required. For example, an A level in Law, Diploma in Criminology and an A-Level in Sociology gives students an advantage in the applied understanding of the subject areas whilst maintaining academic rigour.

Another example is Engineering where there is no A level and students study A/AS Level Maths, A-Level Computer Science and/or Physics and the BTEC Engineering resulting in over 90% of students studying engineering progressing to university to study engineering at a higher level. It is difficult to see how the current standards proposed for engineering manufacturing, processing and control (which is defined as engineering) can possibly equip

the same students with the same pathway to higher education. Options such as pipe welder, composites technician are clearly occupational and it is difficult to say how they can possibly offer the same UCAS outcomes or be the equivalent of A levels. Moreover, they are very limiting in transferrable skills as they develop very specific occupational competencies.

- 3. The stability of colleges and the ability to implement a change of this scale in a such a short amount of time. With the reduction in students being able to study an appropriate course Post 16 there will be less income at for colleges. Less income results in less investment in the local economy and undermines the key role that many colleges play as an anchor institution and this will impact the society colleges serve, will increase social issues and NEETs, will decrease the skills and reduce the ability to promote improvement.**

Colleges liaise with schools to provide advice and guidance for students particularly in Years 8 – 11. Given that the current detailed information on T Levels is limited offering advice and mapping pathways for future students and their parents is severely hampered. Clarity of the content of the qualification and evidence of successful destinations along with a proven track record of the value of qualification is important to young people and their parents when making life changing choices about education pathways.

Colleges are often a key anchor in their localities and work closely with Councils to promote improvement, working together to tackle NEETs and to provide opportunities for communities to upskill. Colleges should be seen as key to the levelling up agenda and yet these proposals reduce the ways that this can be done instead of supporting it.

To give an idea of scaling following the implementation and de-funding our college will need more than 500,000 work placement hours if students are to undertake T levels on the same scale as other Level 3 qualifications. These figures are not 'challenging' they are simply not feasible without further flexibilities and revision.

The only conclusion to be drawn is that not as many students are envisaged to study 16-18/19. This will inevitably impede social mobility. This is not being conveyed by the impact assessments.

What changes should be made to assist implementation of reforms

Applied Generals 6 key changes

1. Recognise the comments and evidence in response to consultation and consider the expert advice rather than adopting the current fixed position to simply remove the Extended Applied Generals.
2. Use evidence of the progression outcome to judge whether a qualification leads to Higher study or employment. Recognise expert practitioner advice on high value AGQs and University support for them as an entirely appropriate route to HE.
3. Retain high-value extended diplomas with a line of sight to HE or specific outcomes and which do not offer a singular A level route or entry-level to a job, e.g. engineering, applied science which primarily progress to HE. The test being the more rigorous RQF leading to higher education. Set up a joint High value AGQ GROUP consisting of expert practitioners, sector bodies and HEI representatives to review the list for retention.

As a minimum retain extended diplomas in the following

Engineering, performing arts, sport, public services, applied science, business, IT qualifications. These do not have a corresponding direct A Level and significant numbers progress.

4. Retain the diplomas (2 A level equivalents). There seems to be some misunderstanding by policy staff about combinations. The diploma allows combination with AS and or A level and the extended certificate with a greater proportion i.e. 2 A level equivalent.
5. Allow industry-specific shorter qualifications to be funded as part of study programmes which will provide students with valued industrial skills and facilitate the levelling up agenda.
6. Carry out a further and more sophisticated disadvantage impact review to determine the impact on BAME and low-income households. Insufficient funding could lead to disenfranchising both the poor and/or BAME students.

T levels

1. Phase any qualification reductions to ensure an effective transition. 2023 is not sufficient time for 100,000s of placements to be established for T levels and defunding of qualifications unless the intent is to reduce access to further education both in schools and colleges.
2. In the consultation constant reference is made to the value employers place on work experience. If this is the case employers should be compelled to offer a placement with numbers being proportionate to employer size.
3. Allow industrial placement hours to accumulate from the transition programme and allow any combination of accumulation for maximum flexibility. This is a key element to make T levels 'implementable'. This is a key recommendation and would make the T level more achievable for example this would allow 100 hours per annum.
4. Allow non-specific job experience up to 50 hours to count where evidence of employment is provided; this demonstrates the ability to organise self, customer service, teamwork, communication skills. The Government and employers state that soft skills are of significant value and are not sector-specific.
5. Recognise that working practices are changing and allow up to 70 hours of virtual placement and an employer set project to count towards the placement hours.
6. Include more consideration of safeguarding with no student to be compelled to travel unacceptable distances nor travel times, nor should they be required to attend during high risk periods such as late at night. The current guidance suggests it is acceptable for such practice if it is industry patterns. Students however are unremunerated and should not be exposed to unnecessary risks. There is a clear potential breach of safeguarding.
7. Recognise financial turbulence and provide safety funding to institutions as when current study programmes were introduced. The current pilots provide a limited guide as they are not at large scale. Review costs and recognise that T level funding is likely to need an increase in subject/skills areas. COVID and inflation have already eroded any base rate increase.
8. Review the awarding structure of the T level to ensure students can achieve a meaningful qualification if they are unable to complete the whole qualification. This is key to levelling up as a certificate of achievement will have little if any currency with students nor wider recognition with employers and HEIs as it does not signify a level of pass. This will be of little value to students who may have spent 3 years studying. A graduated system should be implemented as with other qualifications. For example, A diploma award if all examined elements are completed carrying a value of 2 A Levels with an advanced diploma if all elements are completed offering 3 A Level equivalent.