



The lack of reference to technical skills in the design of the Core. In Science, for example, it would be relevant to cover basic laboratory skills and health and safety procedures in the Core.

The different assessment approaches in T levels compared to apprenticeship assessment plans, when the qualifications are designed to the same occupational standards. In particular, the inclusion of a significant examined component for all T levels regardless of whether this is the most appropriate assessment method for the content.

We disagree with the mix of A*–E and Pass/Merit/Distinction grading used for components of the T level as potentially confusing for employers, students and parents. It is unclear to what extent employers truly want to see the level of discrimination provided by A*–E grading for the Core.

We oppose the proposal for a single assessment series in May/June each year, as not flexible enough for centres. Additionally, students who fail any aspect of the T level will not have any certificate to show for two years of work; a year is too long to wait for a re-sit in those circumstances.

Following the consultation, Ofqual will now allow up to two assessment series each year, with no fixed assessment windows. The timing of assessment opportunities and the availability of a second annual assessment series will be at the discretion of the awarding organisations.

While a T level cannot in itself result in the award of RSciTech due to the limited employment experience it will offer, relevant Occupational Specialisms and industry placements should be designed to provide a good base for students to work towards the award in the longer term.

We support the principle of work placements for students following technical qualifications, but are concerned about:

The potential workload implications for both providers and employers, and the lack of support committed for employers in particular; we have suggested the apprenticeship levy could be used for this purpose. We have pointed out that the chemical sector comprises a large number of small and medium-sized enterprises (SMEs) for whom the financial and time investment would be particularly significant.

Potential barriers to students taking work placements or employers offering them, both in general and specific to our sector, including:

- barriers to travelling to a place of work, especially in rural areas

The availability of technical equipment and the ability to recruit specialist teachers are significant challenges to providers in delivering T levels. Aside from sufficient funding, we called for training opportunities for teachers to be designed and made available in good time.

Following consultation, the DfE stated that up to £20m will be invested to improve quality of teaching, and that they will work with the sector to develop a programme of support for providers.

We are concerned about proposed performance metrics for T levels due to the potential for perverse incentives. Completion, attainment and progress metrics are dependent on the nature and prior attainment of the intake, and cannot be used as a proxy for provider quality. Such metrics may encourage providers to not accept students who could benefit from following a T level programme. Performance of providers should be monitored, but in a supportive way, with help and guidance available for those who need it.