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Consultation on T level content

Dear Carmel,

We welcome the opportunity to respond to the draft course content for T levels on 'Onsite Construction', 'Building Services Engineering', and 'Digital Support Services' consultation.

The introduction of these T levels has the potential to make a positive contribution to how construction employers recruit and train young people. However, several issues need to be addressed as a matter of urgency to ensure employers engage with these qualifications and they become a recognised and valued route into the sector. It is also essential that T levels successfully link learners to the existing apprenticeship system.

Our concerns fall under three areas:

- The course content of these qualifications does not currently meet construction employers' training needs.
- More detail is required on how relevant, high-quality, industry placements will be developed, offering sufficient choice and benefit to learners.
- A clear route from T levels into the construction industry, that creates work-ready candidates, needs to be agreed.

Developing course content that meets employers' needs

Construction employers and federations have raised concerns over the methods used to develop the content of the new T level courses. This content currently maps closely to existing qualifications. Due to this, employers and federations have raised concerns that the new courses reflect the provision colleges want to offer instead of a new, improved and alternative system that meets industry requirements.

T levels need to reflect the needs of employers, while engaging with colleges to ensure that the proposed syllabus is deliverable, as with apprenticeship Standards. CITB has carried out extensive work with industry and providers to develop the 14-19 Standards for Construction and the Built Environment. This would provide a solid base to develop T level knowledge content. CITB will similarly carry out a mapping exercise to identify what content could be used to support T levels. CITB would be happy to share this mapping with the IfA.

Construction employers and federations have also raised concerns that they have not been adequately engaged in the development of course content. As a result of this, T levels risk

suffering from some of the same shortcomings as the development of early apprenticeship Standards for construction, inadequately reflecting the breadth of industry views.

Due to a lack of industry engagement, early drafts of some Standards did not reflect the needs of all employers and required additional work, such as bricklaying and plastering. This caused future delays for employers in being able to access these new courses. This also created additional challenges for training providers, due to uncertainty over what course they would deliver.

Ensuring relevant, high-quality industry placements

The new T levels draft content does not indicate what steps awarding bodies will be required to take to ensure relevant, high-quality industry placements for learners. Placements need to allow people to develop the broad technical and behavioural skills required to work in the industry in their chosen occupation. Employability and behavioural skills developed in the workplace are fundamental to succeeding in the construction industry, as identified in recent CITB research into Offsite Construction and Digital Skills.

To do this effectively, each learner's T level industry placement will need to be spread across multiple employers, allowing them to get a better breadth of understanding of the industry. This will also allow smaller employers to get involved in offering placements.

Learners will also need the opportunity, through their general year, to find the right occupation for them. They will only be able to do this by trying different occupations. Owing to the subcontracting structure of the construction industry, relatively few firms have the range of occupations in-house to be able to offer this breadth of experience. So sharing placements between multiple employers could reduce the burden on individual employers, give learners the chance to try different occupations, and help micro and small employers, who represent 98% of construction businesses, to get involved.

CITB could help support industry placements with multiple employers across construction through a model like the Construction Skills Fund. Working with employers, 24 on-site learning hubs will offer experiences to enable 16,500 people to enter employment site ready. The current specification in the outline course content for T levels simply states that placements will be "an industry placement with an employer, which will last for a minimum of 45 working days," which must be urgently clarified.

Finally, placements must be adequately assessed to provide high-quality, valuable learning experiences for candidates. The awarding body should have this responsibility, given they are already responsible for ensuring that all parts of the course deliver against learning objectives.

Producing work-ready candidates

T levels on their own will be insufficient to make people work-ready. While they have the potential to bring learners closer to work-readiness than existing college courses, the consultation documents state that "achievement of threshold competence signals that a student is well-placed to develop full occupational competence, with further support and development, once in work."

For T levels to provide a viable alternative route work, employers will need to invest in further in-work training to move learners from threshold to full competence. If the Government wants to make these courses a success, they may need to support employers to provide this additional training. The existing NVQs in construction provide a set of work-based competency qualifications respected by industry. Currently there is a work-based

route through which experienced workers can achieve an accelerated NVQ to prove occupational competence. The Government should assure industry that, as these are work-based rather than college-based qualifications, access to NVQ funding would not be restricted by learners having taken a qualification at the same level.

Summary of key concerns

- The proposed course content does not adequately map to the needs of employers as identified through our industry research and engagement – what steps will the IfA take to learn from the redrafting issues of early apprenticeship Standards?
- How will the IfA require awarding bodies to assess the quality of industry placements, ensuring they deliver for learners?
- Will the IfA allow industry placements to be shared between multiple employers, providing a greater breadth of work experience for the learner, and allowing micro-businesses to help deliver them?
- How will the IfA and Government support employers to provide additional training so people with T levels can become work ready?

We would be delighted to meet with you to discuss these issues further. We are keen to ensure that T levels can contribute towards addressing the skills needs of the construction industry, and want to ensure they are a success.

Yours sincerely,

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