



Mrs Gillian Keegan MP
Parliamentary Under-Secretary of State for
Skills & Apprenticeships
Department for Education
Sanctuary Buildings
20 Great Smith Street
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30th March 2020

Dear Minister

MAINTAINING QUALITY & STANDARDS DURING THE CORONAVIRUS PANDEMIC

I am writing to thank you and your officials for the incredible hard work and flexibility that the Department has demonstrated, particularly as we tackle this unprecedented challenge during a national emergency.

I have been working closely with colleagues in the various divisions of the Department, as well as with regulators and statutory agencies.

The Federation supports many of the flexibilities and adjustments that have been made in recent weeks, whilst strict social distancing measures have been put in place. My Board issued a statement on 20 March (attached for ease of reference), which outlines the key 'asks' of government to ensure that the post-16 skills system does not collapse over the coming weeks.

Furthermore, I thought it would be helpful to set out some of the other constructive comments and key concerns that we have put forward about how the post-16 skills system can continue to maintain the highest possible quality and regulatory standards in vocational technical education and apprenticeships

T-Levels

We very much share the government's ambition to introduce these world-class technical qualifications at Level 3 when they are ready. The main aim of T-Levels is to ensure students can progress to skilled employment in occupational sectors of the economy where we know there will be demand to boost long-term productivity and growth.



It is perhaps still too early to say exactly what impact Covid-19 will have on the colleges tasked with delivering T-Levels; just as it will be difficult to gauge the appetite of employers in a post-crisis economy, where T-level students will be expected to carry out a structured industry placement.

Because of such uncertainty, as well as the recent advice from the Deputy Chief Medical Officer, that disruption to our normal way of life could last at least six months, I would urge you to think about postponing the (Wave 1) T-Levels, due to be rolled out in September this year. Our recommendation to you is to combine Wave 1 with Wave 2 rollout, commencing September 2021. This would result in a critical mass of ten new T-Level qualifications being available to L3 students from 2021, instead of just the three T-Levels planned this year.

The reason for this request is because the Federation does not believe that the approved delivery network of providers will be able to fully cope with the introduction of T-Levels in September due to the unfolding crisis of Covid-19. Moreover, we think that the focus of many firms over the coming months will be one of financial recovery. This will make it extremely difficult to engage companies to offer high-quality industry placements in the foreseeable future.

Vocational Technical Qualifications (VTQs)

The Secretary of State moved very swiftly, working with our examination board members and JCQ, to find a solution to the cancellation of this summer's examinations for GCSEs and A-Levels. The model currently being explored will help teachers more accurately estimate pupil grades with, critically, robust external moderation provided by the exam boards and the regulator, Ofqual.

The VTQ landscape is more complex. Often, these non-linear and/or competency-based qualifications will share an array of appropriate assessment methods. Ofqual regulates VTQs to ensure they attract the highest possible levels of public confidence. Moreover, if they didn't apply a robust approach, for example, to the reliability and validity of VTQs, we could potentially see significant harm caused to other people in society because of incompetent individuals or apprentices being wrongly assessed or certified to practice in a trade or skill. In that very real sense VTQs are not like academic qualifications such as GCSEs and A-Levels, where the main downside of 'failing' a qualification is felt more by the individual.

Functional Skills Qualifications

I appreciate that you will be coming under significant pressure from some college and training provider representative bodies to allow teacher estimation of Functional Skills Qualification (FSQ) results; on the basis that to do otherwise could disadvantage learners compared to their peers in the same cohort taking GCSEs. However, I would strongly urge you not to make a



decision on this basis which could really undermine public confidence in the VTQ system as a whole.

I am aware from working with Ofqual colleagues on this, that they have some serious concerns about applying an estimation model to FSQs (which are fundamentally different to GCSEs). I believe it is vital that both AOs and the qualifications regulator can stand behind awards made on this basis, which I very much doubt they will feel able to, because of the major differences between FSQs and GCSEs.

It is my understanding that GCSE teacher estimates will be moderated through a sophisticated process of statistical adjustment, based on previous cohorts, that is simply not available in relation to FSQs. Not all functional skills teachers are up to speed with the new standard, and they would in any case struggle to accurately predict likely performance of learners on new qualifications that were only introduced six-months ago.

Such a blunt estimation approach risks undermining public confidence in these qualifications before they have even had a chance to become established. For these reasons, the Federation does not support an estimation approach. Instead, we are supporting our members, with the regulator, to work through what other forms of adaption of assessment methodology might be appropriate to allow robust assessments to go ahead, where necessary. For candidates where the need is not urgent, it would be better to delay assessments. You could for example create more room for this, including by suspending the Condition of Funding requirement that centres enter candidates for Level 2 FSQs even where there is no expectation that they will pass; as well as postponing the requirement for apprentices to pass FSQs before taking their end-point assessment.

There are some positives. It is clear to me, in dialogue with AOs, that a number of my members have the expertise and capacity to deliver secure and well invigilated FSQs at scale, using online technology and remote assessment. I would encourage the Department and Ofqual therefore to work with these AOs to roll-out a credible online model of assessment over the coming weeks. This approach is more preferable than allowing a provider-led FS model that is based on tutor estimation with all the drawbacks already discussed.

Given the urgency, and while recognising the very difficult circumstances, I would urge you to reach a swift decision on extending the availability of legacy FSQs, so that learners who were due to take their assessments in the coming weeks do not “time out” in August 2020. Since, in such cases, they would need to undergo a significant additional teaching and learning to prepare them for the reformed versions of the qualifications, adding to further pressures on providers.



Apprenticeships

As the main representative body for End-Point Assessment Organisations (EPAOs), we are working closely with the Institute for Apprenticeships and Technical Education to maintain support to employers, providers and apprentices at this challenging time.

I think it is important, however, to be realistic about how many of the approved apprenticeship frameworks/standards lend themselves to distance-learning and remote assessment techniques. For some standards there are secure technology solutions in place. But for many practically-based skilled occupations, the notion of computer-based remote assessments will be impossible. It is why many EPAOs report to us that they are simply mothballing operations and placing staff on furlough.

I'm afraid that what this crisis has brutally exposed is the complete inadequacy of the external quality assurance model for English apprenticeships. Twenty EQA bodies currently have this role and my members have reported major inconsistencies and difficulties working with EQAs since their inception. The vast majority of the Federation's EPAO members strongly supports the Institute's EQA consultation, which sets out a more streamlined approach to external quality assurance in future. We agree with the central proposition that only statutory bodies like the Institute, Ofqual and OfS should be involved in this critical function, paid for by central government.

On this note, I have written separately to the chief executive of the Institute calling on her to scrap the EQA charges introduced in November 2019 with immediate effect. It cannot be right that we have some EQA bodies effectively profiteering off the back of the current crisis when this quality assurance role should always have been undertaken by statutory bodies free of charge.

Covid-19 Recovery Facility

Confidentially, I have put in some proposals to the Education Skills Funding Agency (ESFA) about how we might better support the sector to get back on its feet during and post-crisis.

I believe the Treasury has moved comprehensively to support the UK economy, which the entire post-16 skills system in England should benefit from, including my members, as they look to access support over the coming weeks.

Can I encourage you, however, to start to think about the unique types of support that will be needed once the social distancing measures are no longer in place. At that point it may prove necessary to extend a temporary financial or loans-based facility to the sector, via the ESFA, to offset the activity providers/AOs/EPAOs have lost while being effectively shut-down.



We must, of course, avoid the moral hazards associated with government allowing private providers to 'commercialise the profits and socialise the risks' of their operations; but equally, we should not allow, as a country, for thousands of learners and apprentices to be left stranded.

I will contact your private office this week to set up a call with you to discuss these issues further. If you need to speak with me in the meantime, my number is **07917 543408**.

With very best wishes,

Tom Bewick
Chief Executive