

## **Response from the Greater London Authority to the Government's consultation on T-Level Funding Methodology**

**Submitted 19<sup>th</sup> February 2019**

### **Question 1: Do you agree with the proposals for funding bands and hours set out above? Yes/No. Please give reasons for your response.**

Yes. We welcome the approach to fully fund 18-year olds at the same rate as 16 and 17-year olds. This supports the significant number of older young people in London, who may have started their study later owing to disruption or disadvantage at an earlier phase of education. For equity, we feel that parity of funding should be extended to all 16 to 18-year olds, rather than non-T Level students being funded at a reduced rate.

### **Question 2: Do you agree with the above approach to allocating T Levels to funding bands, subject to further checking against the emerging content for each T Level? Yes/No. Please give reasons for your response.**

Yes. We agree with the approach to allocate funding to T-Levels through funding bands. However, the GLA is concerned that funding bands are pegged to a base rate of £4,000 that has not been increased for over 5 years. This position means that the core funding continues to be reduced by inflation pressure and other costs, and risks adversely impacting learners through weakening the financial position of colleges.

### **Question 3: Do you agree with the above method for allocating funding for industry placements for students on T Levels? Yes/No. Please give reasons for your response.**

The method for allocating funding to providers for industry placements seems sensible, being above the rate suggested in the Sainsbury Report, and based on what was made available for previous work experience trials.

What remains a concern is whether any consideration is being given to whether some of this funding, or additional funding, should be made available for the employer providing the industry placement. Government made funds available in the past for employers taking on an apprentice through the Apprenticeship Grant for Employers (£1,500) which the London LEP matched, thereby doubling it. Not identifying additional funding for this purpose may be seen to assume that employers are willing and able to withstand any costs associated with hosting the industry placement.

### **Question 4: Do you agree with the criteria set out in Annex A for the completion of an Industry Placement as part of a T Level? Yes/No. Please give reasons for your response.**

The criteria for the successful completion of the Industry Placement as part of a T level sounds sensible, in particular, the explicit reference to the learner having developed and demonstrated behaviours and attitudes expected in the workplace, the lack of which persists as a concern raised by many employers.

However, some providers have expressed concerns about not being able to use more than one placement to meet the requirement and that the requirement should be reviewed.

**Question 5: Do you agree with the approach for funding level 2 maths and English for those students who have not yet met the minimum exit requirement? Yes/No. Please give reasons for your response.**

Yes. We welcome the additional funding for Maths and English, in order not to impact upon the funding made available for the T level hours. We would like to see the additional resource extended to all 16 to 18-year olds to enable them to progress to T-Level.

However, the guidance appears to suggest a Level 2 in Functional Skills is an acceptable alternative to a GCSE Grade 4 or above, which appears different to the Condition of Funding approach for individuals with a GCSE Grade 3 who are required to study GCSE. We feel that any approach should be consistently applied, to allow all 16 to 18-year olds to benefit from Functional Skills where appropriate to their study needs.

**Question 6: Do you agree with the above proposals for ensuring that the extra funding for T Levels programmes is made available in the year it is needed, before reverting to the usual lagged method of funding? Yes/No. Please give reasons for your response.**

Yes. The approach to providing extra funding will ensure that providers have the capacity to deliver successfully before reverting to the system of lagged funding.

**Question 7: Do you agree with the above proposals for applying retention arrangements for T Level programmes? Yes/No. Please give reasons for your response.**

Yes. The approach to apply an equivalent retention approach to T-Levels will ensure consistency with study programmes for 16 to 18-year olds.

**Question 8: Do you agree with the above approach for applying PCWs to T Levels programmes? Yes/No. Please give reasons for your response.**

Yes. We welcome the approach to ensure that the different costs of delivery are reflected in the PCWs for T-Levels. It will be important to ensure that the DfE accurately assesses costs when applying PCWs to ensure that more expensive delivery areas are supported appropriately.

**Question 9: Do you agree with above proposals for incorporating level 2 maths and / or English funding into the funding formula? Yes/No. Please give reasons for your response.**

Yes. The application of disadvantage and area costs uplifts to the Maths and English funding rate is welcomed. This addresses the additional costs of delivery and support in London.

**Question 10: Do you agree that disadvantage block 1 funding should be provided for T Level students on this basis? Yes/No. Please give reasons for your response.**

Yes. We agree that disadvantage should be recognised within the T-Level formula. However, the GLA recognises that the use of postcodes to determine disadvantage may not necessarily address

the harder to help. In view of this, the GLA expects to conduct its own research into how the disadvantage system for the AEB may better reflect personal characteristics, the result of which will be shared with the DfE in due course.

**Question 11: Do you agree that extra disadvantage block 2 funding should be provided for T Level students on this basis? Yes/No. Please give reasons for your response.**

Yes. We welcome the provision of additional funding for disadvantaged learners. However, we are concerned that a change in distribution of disadvantage funding should not be to the detriment of Level 1 and Level 2 16 to 18-year olds, who often demonstrate significant disadvantage and require increased support to progress towards their learning outcomes including T-Levels.

**Question 12: Do you agree that the Advanced Maths Premium and the Large Programme Uplift should apply for T Level students on this basis? Yes/No. Please give reasons for your response.**

Yes. The GLA supports the approach to encourage study at higher levels. This reflects the need in London for higher level skills to support the economy and jobs growth.

**Question 13: Do you agree that the extra funding that will be provided for the new and larger T Level programmes should be uplifted by area cost allowances as described above? Yes/No. Please give reasons for your response.**

Yes. Area costs are critical to support provision in geographical areas where costs are demonstrably higher. This is particularly the case in London, and therefore the GLA agrees with this uplift.

**Question 14: Do you agree with the above proposals for ensuring there is a way that provision can respond to the skills needs of particular local areas? Yes/No. Please give reasons for your response.**

Yes. The new Skills Advisory Panels, capital investments using funding from the Local Growth Fund and the Local Industrial Strategy will together help regions to make their providers' offer as responsive and relevant as they can be. Moving forward, London's proposed Skills and Employment Knowledge Hub will be the key resource behind which providers' and employers' decisions around how curriculum design should be made. This Hub will be an online tool that will bring together a range of information and data about skills and employment in London. It is expected that the Hub could help to inform strategic decision making, commissioning and provision planning. Data will include trends and forecasts where available.

**Question 15: How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.**

Gender bias remains a barrier to equality of opportunity in participation in current technical programmes, which is long-standing and reflects the labour markets in construction, engineering and childcare. Similarly, participation in different technical programmes also varies widely by ethnic origin. The Mayor's Construction Academy and Digital Talent programme are both targeting

underrepresented groups, and it will be important that the roll out of T-level similarly ensures equality of opportunity for all.

Local authorities, using student Education Health and Care Plans, must ensure that the industry placement requirement does not act as an obstacle to young people with disabilities undertaking T-levels. We are also concerned that the T-Level reform does not include 19-23 olds, who may not be able to study T-Levels. Many learners within this cohort study at level 3 funded from the Adult Education Budget and alongside 16 to 18-year olds. Unless the availability of T-Levels is extended to this group of older young people, curriculum delivery will be inefficient and costly to colleges and training providers as these age groups are currently taught together, and older young people will be at disadvantage and not able to fully benefit from the reform.