

In general, the funding formulae and bands set out in these proposals are reasonable and in line with other programmes funded by the ESFA. 2.3 (.)-1EEposamEs a3 (pr)-e3 (e f2.3)-12.2 (b)-9 (n l)-9 T1.272 0 Td ()Tj3.0

While we support the principle of T-levels in general and the value of work experience in particular, all stakeholders must be realistic about these issues, and the best interests of students must be central. It would be unthinkable to be in a position where students have enrolled on a T-level and dedicated perhaps a year of study towards it, only to find themselves unable to complete the programme and gain their certificate because no industry placement has been found for them. The consultation states that, once funding transitions to a lagged arrangement, the second year's funding will be conditional on the placement being completed. We question whether withholding £275 for non-completion of the placement is sufficient incentive for providers to ensure all placements are appropriately managed. Clarification on how completion of industry placements will be audited would also be welcome.

As general points, the consultation says very little about consequences to providers (in terms of funding or otherwise) in the event of non-completion of the T levels (p5-ns)-8 (e2 (her)-18.4 (w)9.1 (i)3 (i)3.2

Do you agree with the proposals for applying retention arrangements for T-level programmes?

The proposals are not clear as to the criteria for the full payment of the second year of funding. The wording suggests that the second year of funding will be paid for any student who completes the qualifying period of 6 weeks. Again, we are concerned that this means providers may receive full funding even in the event that a student is not able to complete the T-level due to unavailability of an industry placement – the only penalty would be loss of £275 for the second year of industry placement

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We further note that if T-level provision purely reflects the local area, students may become trapped by their locality. At 16 they will not yet be as mobile as they might become later in life. Students in parts of the country where few employers are based locally may therefore have limited T-level options available to them. We recognise that this is out of scope for this consultation, but wish to record that the wider review of Level 3 qualifications must take this into account to ensure that all young people, regardless of location, have a good range of choices besides A-levels available to them.

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?