



The Rt Hon Gavin Williamson CBE MP  
Secretary of State for Education  
Department for Education  
Sanctuary Buildings  
20 Great Smith Street  
London, SW1P 3BT

19 March 2020

Dear Secretary of State

## **COVID-19 RISK MITIGATION – EXAMS, ASSESSMENTS AND APPRENTICESHIPS**

Firstly, I'd like to welcome your statement on the floor of the House last night setting out a clear set of decisions around school / college closures and the summer examinations.

We are working tirelessly behind the scenes with your officials, colleagues at Ofqual, IfATE and other key stakeholders, to ensure that no students or apprentices will be disadvantaged by the adverse impact of coronavirus. I would like to put on record my sincere thanks to your officials and the heads of statutory bodies like Ofqual and the Institute who are doing an amazing job in very challenging circumstances.

There are some ongoing issues that we are dealing with as an industry sector which I thought you and officials would welcome being appraised of in a single note.

- 1. Assessing General Qualifications and Vocational Technical Qualifications.** These unprecedented times demand flexible and workable solutions so that students and apprentices get the graded qualifications they deserve. We will continue to work with the Joint Council of Qualifications (JCQ) who are leading this strand of work with the relevant exam boards and the Department on assessing GCSEs/A-Levels/Applied Generals. FAB will continue to lead the strand of work looking at the implications of assessing VTQs and apprentices. We already represent the largest number of End-Point Assessment Organisations (by volume) in the marketplace. It is critical therefore that all EQAPs/EPAOs are issued with the agreed Guidance as soon as possible so that they can begin to put in place the mitigating measures that can ensure apprentices can continue to be independently assessed for occupational competence. Any further delay of this Guidance is putting in jeopardy the ongoing employment status of apprentices who may unfortunately find themselves being made redundant.
- 2. T-Levels and Wave 1 September 2020 delivery.** Following consultation with our members and, specifically, those AOs that have to date successfully secured licences from you to design these new technical qualifications, I am requesting that you



postpone the Wave 1 commencement of three T-Levels in September. The colleges, and therefore the delivery network, will be in crisis management and recovery mode up until the autumn term. Similarly, asking employers to provide high-quality industry placements at this time looks very challenging when you consider that the deep economic shock we are experiencing will pre-occupy company survival plans for at least the next 12 months. FAB would recommend that you look at combining Wave 1 and Wave 2 T-Level roll-out plans with a new commencement date of September 2021. I would like to stress that FAB completely backs the policy objectives of T-Levels and the wider reforms around improving technical and vocational education.

- 3. Post-16 Qualifications Review 'No and Low' Enrolments.** I have been in close dialogue with your officials about the impending deadline for AOs to notify the Department of which regulated qualifications we would wish to see continue for public recognition. Undoubtedly, there are a significant number of qualifications, that after a basic 'housekeeping' exercise, AOs would be happy to see fall off the register. But there are also a critical number of low enrolment and SEND qualifications that require more careful consideration. In the current environment, with colleges and other education settings ordered to close, it is simply not going to be possible to meet the initial deadline of notification of 27 March. That's because AOs are required to consult stakeholders and gather supporting evidence. This is not possible in the current climate and, understandably, it is not seen as a business critical issue by the wider sector. We would recommend therefore that the whole Level 3 qualifications review, including the moratorium, is put back by one academic year. This will help provide some much-needed stability in the post-16 sector, as well as ensure that students reliant on niche vocational qualifications and industry awards are not unduly penalised.
- 4. Work on 'strengthening qualifications'.** Ofqual published their regulatory requirements for Applied General qualifications included in 2023 Key Stage 4 performance tables last month. The new regulations include significant changes, such as the inclusion of terminal assessment, which will require awarding organisations to redesign specifications and produce additional supporting documentation such as assessment strategies for each qualification. The process for submitting qualifications for inclusion in the performance tables was published by the Department on 6 March. This requires awarding organisations to submit redeveloped qualifications along with supporting documents and sample assessment materials by 30 April. Even in normal times this was an ambitious schedule but looks completely unfeasible now. FAB recommends that the deadline be extended to ensure that awarding organisations can complete the necessary work and submit their reformed qualifications for consideration. Ofqual's updated regulations for applied general qualifications follow their research on strengthening the integrity of technical and vocational qualifications. This strengthening project also informed the recent introduction of Centre Assessment Standards Scrutiny (CASS). AOs' support Ofqual's work on



strengthening and attempts to enhance public confidence in our sector. However, given the current crisis, the more time to implement changes is required would help ensure that staff can focus on dealing with all the implications of Covid-19.

**5. Apprenticeships.** I don't need to tell you how fragile the English apprenticeship ecosystem for employers and their apprentices is right now. Under the skilful leadership of the Institute, major progress was beginning to be made in the shift to higher quality standards compared to old frameworks. Moreover, following a drop-off in starts in 2017, when the Apprenticeships Levy was first introduced, optimism was beginning to return to the sector that we could turn the corner on falling starts and put numbers back onto historical trend. The adverse impact of coronavirus on the labour market is huge. We know from previous economic downturns that training is often the first expenditure item that firms will cut. We've also seen apprentices, who fall below the 2-year-employment protection rules, easily laid off. We think there are a number of bold and imaginative measures that the Department and the Treasury should be looking to implement immediately. The obvious one would be to protect apprentice lay-offs at this time (for 6 months) by using powers in the Emergency legislation to prevent firms doing this. In return, employers would receive a percentage towards wage compensation measures, in addition to a temporary national insurance holiday. These measures would have the impact of underwriting employer confidence in the apprenticeship system and ensure that SMEs, in particular, continued to want to take on apprentices. If we don't take bold action like this, apprentice numbers will fall off a cliff and lay-offs will continue over the coming weeks. I'd be happy to provide a more detailed submission to your officials on this matter if it would be helpful.

Finally, I would like to reiterate that the Federation stands shoulder-to-shoulder with you during these difficult times. We do appreciate the incredible pressure you and your colleagues are under as you help steer our country through this unprecedented crisis.

Exam Boards, Awarding and End-Point Assessment Organisations stand ready to do whatever it takes to work collaboratively with you and key stakeholders as we face the obstacles ahead.

I am copying this letter to the chief regulator, Sally Collier (Ofqual), Jennifer Coupland (IfATE); Eileen Milner, (ESFA) and David Hughes (AOC).

Yours sincerely,

Tom Bewick  
**Chief Executive**