

University Alliance response to DFE Higher Technical Education Review consultation – September 2019

For further information please contact Ellie Russell, Deputy Head of Policy: ellie@unialliance.ac.uk

Consultation question, answer format and relevant paragraphs in consultation document	UA response
<p>Paragraphs: 8- 9 (p.11)</p> <p>7. To what extent do you agree or disagree with the proposed aims of HTQs set out in paragraph 9 above?</p> <p>Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p>	<p>Agree.</p>
<p>Paragraphs: 10- 24 (pp.12-16)</p> <p>8. Are there any points you would like to raise regarding our proposal for Awarding Bodies to voluntarily submit qualifications for approval by the Institute against occupational standards?</p> <p>Answer options: comment box</p>	<p>We are pleased to see that DfE expects that more than one HTQ might be approved as meeting the requirements of the same occupational standard and we would urge that this remains the case as the proposals develop. This will be important for ensuring that choice exists for students to access a range of providers and qualifications. HEIs will have high-quality qualifications to offer across different regions and whilst some validated/franchised arrangements for these qualifications does take place, it is not to the same scale and coverage as other awarding organisations.</p> <p>Our 2018 publication ‘Ladders of opportunity’ recommended explicitly branding programmes as preparation for progression within a particular technical route. We support what the proposed kitemark is aiming to achieve in principle, but there are some key concerns about the proposed process that need to be addressed.</p> <p>One concern is the scale of the task to ensure the IFATE approval process will be “streamlined, straightforward and timely”. Our members have experienced delays when working with IFATE and there already appears to be backlog in the approval process for degree apprenticeships. Better transparency on decision-making and communication throughout the process is also needed to help build confidence. We are also concerned about the ongoing challenge of engaging a broad range of employers, particularly SMEs, in route panels.</p>

	<p>We would also suggest that the Institute and route panels should flag, in advance of the approval process being opened, those occupations where it thinks it will be difficult for taught provision to command employer confidence and/or deliver sufficient competence to enter that occupation. This should not prevent qualifications being submitted for approval, but would help inform awarding bodies about the likelihood that they will be embarking on a lengthier process of review, re-design and approval.</p> <p>Another concern is the proposal to manage the flow of qualifications coming forward for approval by taking a phased approach which mirrors the rollout of T-Levels. We understand this will be a large undertaking for the Institute and that the T Levels rollout is reflective of the need to address STEM-related skills gaps. However, we are concerned this approach will mean that for at least two academic years there will be existing HTQs that awarding bodies would like to take through the approval process, but which will not be kitemarked and therefore potentially considered lower quality by prospective students if DfE's proposed marketing campaign is successful. We are also concerned that this may signal that HTQs are only a suitable progression route for T Level students, rather than also being relevant to those progressing straight from studying A Levels and Applied Generals, or adults wishing to return to education to up-skill who may hold these or other types of Level 3 qualification. It was disappointing to see that the consultation mentions A Levels once and does not mention AGQs at all. We would also query whether focussing on mirroring the T Levels rollout means key areas of demand for adult skills training are also covered in a timely way.</p>
<p>Paragraphs: 25- 28 (pp.16-17)</p> <p>9. What is your view on our proposal that, upon approval of a higher technical qualification, there should generally be no transfer of copyright?</p> <p>Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p> <p>What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?</p>	<p>Strongly agree.</p> <p>We agree with the proposal that Awarding Bodies applying for approval would be informed of the decision to transfer copyright before the qualification is approved, with the option to withdraw from consideration at that stage.</p>

<p>Answer options: comment box</p>	
<p>Paragraphs: 29- 32 (pp.17-18)</p> <p>10. This question is for AOs and HE providers only. How important are the following as incentives to encourage the submission of your qualifications for Institute approval? Please rank from 1 (most important) to 5 (least important).</p> <p>a. A clear mark of labour market relevance</p> <p>b. A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)</p> <p>c. Enhanced support for potential students through information, advice and guidance (e.g. careers advice)</p> <p>d. A swift and straight forward process for submission, appraisal and decision making</p> <p>e. Other (please specify)</p> <p>Answer options: 1 (most important) – 5 (least important for each of a-e).</p> <p>Please provide any specific views on points a-e</p> <p>Answer options: comment box</p>	<p>1: B (Competitive funding package)</p> <p>2: D (Swift and straightforward process for submission, appraisal and decision making)</p> <p>3: C (Enhanced support for potential students through information, advice and guidance)</p> <p>4: A (Clear mark of labour market relevance)</p> <p>We have ranked these incentives as asked, but we think they will all be important as a package and are dependent on each other e.g. improved IAG will be a determining factor in the success of the kitemark.</p> <p>A: We have ranked the clear mark of labour market relevance lower at this stage because of the links our members already have with industries, professional bodies and employers. The more ubiquitous the kitemark becomes with students and employers, the greater the incentive. It should be recognised that not only do existing qualifications provided by our members meet educational standards in the FHEQ, many of them have been developed with employers and professional bodies and are reviewed on a regular basis with their input. Many of these qualifications will therefore be understood and well regarded by local and regional employers, in addition to the recognition and prestige that HEIs attract locally and nationally.</p> <p>B: A competitive funding package would be made more effective by the removal of ELQ restrictions, as recommended by the Post 18 Review panel. A compelling case has not been made that increasing the number of 'prescribed' providers and qualifications will address the fall in mature and part-time students since 2008/09. The return of maintenance grants as proposed by the Post-18 Review panel might go some way to addressing this, but further incentives may be needed. Employers invest significant time and money in learning, but we would question whether these proposals will create an overemphasis on the contribution of individuals and the government in qualifications at Levels 4, 5 and 6 provided in taught settings.</p>

	<p>D: If the proposed additional layer of approval creates a lengthy process for taking new qualifications from concept to market, it could stifle the ability to include innovative content and respond swiftly to changing labour market demands.</p>
<p>Paragraphs: 33- 35 (pp.18-19)</p> <p>11. Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process.</p> <p>a) Flexibility include additional content: it may be beneficial for Awarding Bodies to include a certain amount of occupationally-relevant content in a qualification, which is not aligned to occupational standards. This could respond to specific local and sectoral skills needs or reflect innovative or emerging practices. We are considering to what extent this added value outweighs the dilution of qualification focus and purpose, and whether there should be a limit on such additional content;</p> <p>b) Broader qualifications: whether there is business need for qualifications to be able to cover the knowledge, skills and behaviours in more than one occupational standard;</p> <p>c) Smaller qualifications: whether there is value in Institute approval of smaller, more specialised awards that might cover some but not all of the knowledge, skills and behaviours in a relevant occupation;</p> <p>d) Flexible learning: whether and how modules or smaller qualifications should be approved by the Institute to allow students, especially adults, to step on and off of their course;</p> <p>e) Other requirements: whether it would be beneficial for the Institute to require proficiency in the following, alongside HTQs;</p> <p>(i) Other requirements: Maths</p> <p>(ii) Other requirements: English</p> <p>(iii) Other requirements: Digital skills</p> <p>(iv) Other essential transferable and employability skills</p> <p>(v) Alignment with professional body standards</p> <p>(vi) A period of work-based learning</p>	<p>A: Strongly agree B: Strongly agree C: Strongly agree D: Strongly agree E (i): Neither agree or disagree E (ii): Neither agree or disagree E (iii): Neither agree or disagree E (iv): Neither agree or disagree E (v): Agree E (vi): Neither agree or disagree</p> <p>A: There should be flexibility to include additional knowledge, skills and behaviours that can be better attained through a taught setting. It will be important for HEIs to be able to include research, innovation and industry informed content based on anticipated skills needs. This will help future proof qualifications in industries experiencing fast-paced change, in addition to statutory reviews of occupational standards IFATE already conducts.</p> <p>C and D: Smaller and specialised qualifications, and flexible learning, will play an increasingly important role in supporting learning throughout life. CU Coventry is a good example of an offer that is built around allowing students flexibility to study at a pace which suits them. Courses are created in partnership with professional bodies to certify they are industry-relevant and to ensure students leave with the skills and experiences necessary to further their careers. Each course is built from sets of 30 credit six week modules which are taught one at a time rather than simultaneously and with assessments done at the end of the six weeks. Since there are no co-requisites or pre-requisites, each module is independent of any other enabling multiple entry points across the calendar year. Each year is also equivalent to an award (first year being an HNC, second year an HND, etc). This not only allows students to spread</p>

<p>Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree for each of a-e.</p> <p>Are there any specific points you would like to raise in relation to the above. Please state below.</p> <p>Answer options: comment box</p>	<p>their progression across a period of time which suits them, but it also means each module is eligible for student loan funding as the 30 credits is equivalent to 25% of an award. It also allows students to enter the course at a time that suits them as the CU Coventry is able to offer six entry points across the year.</p> <p>It is not yet known whether a 'competitive funding package' would include measures to support flexible learning, such as a single lifelong learning loan allowance as proposed by the Post 18 Review panel, and what the specific details of this would be. This makes it difficult to properly assess the extent to which the proposals in this consultation will support the quality, prestige and growth of smaller qualifications and more flexible provision.</p> <p>E (i – iii) We understand that a significant number of employers have expressed concern about basic skills in literacy and numeracy. However, we would be extremely concerned about the impact on widening access and HEIs autonomy over their admissions practices if these took the form of compulsory entry requirements and conditions, rather than outcomes to be built into the qualification content.</p> <p>E (vi) A period of work-based learning shouldn't necessarily be required if sufficient immersive learning and assessment approaches can be provided e.g. using simulations of what students would experience in the real world.</p>
<p>Paragraphs: 36- 41 (pp.19-21)</p> <p>12. Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements?</p> <p>Answer options: comment box</p>	<p>Further clarity is needed on whether providers that deliver subcontracted Level 4 & 5 courses would need to register with OfS under these proposals (rather than just the subcontracting lead provider).</p>
<p>Paragraphs: 42- 64 (pp.22-64)</p> <p>13. Are the suggested criteria (listed below) suitable markers of high-quality technical provision?</p> <ul style="list-style-type: none"> • Suitably qualified and experienced teachers with current, relevant occupational and industry experience and expertise, as well as high quality pedagogical skills. Leaders have the capacity and 	<p>No.</p> <p>As registration conditions, these appear much more input focussed than other OfS registration conditions, which are more outcomes focussed. It is difficult to see how the proposed learning environment criteria could be assessed at anything other than course level and we would query the practicalities of this.</p>

<p>ability to ensure provision is sustainable and retains a clear focus on quality</p> <ul style="list-style-type: none"> • Strong links with employer networks, thus ensuring the knowledge, skills and behaviours being delivered are valued by, and relevant to, employers who are engaged and investing in training; and • Learning environments that provide access to facilities and equipment that are reflective of the workplace, including industry-relevant, up-to-date equipment. • A range of criteria similar to that used in the IoT assessment process, which included evidence of; support for regional and national economic growth; employer engagement; relevance to occupations skills needs; and quality industry relevant teaching. <p>Answer options: Yes or No</p> <p>Give reasons for why or why not</p> <p>Answer options: comment box</p>	<p>More information is needed on what is meant by 'suitably qualified' teachers, particularly given current OfS registration conditions do not include qualification and experience of teachers.</p>
<p>Paragraphs: 42- 64 (pp.22-64)</p> <p>14. To what extent do you agree or disagree with the principle of the OfS applying technical ongoing registration conditions that a provider would be required to meet to indicate the high quality of their HTE provision?</p> <p>Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p> <p>If you disagree what could an alternative approach be? If you disagree please give reasons.</p> <p>Answer options: comment box</p>	<p>Disagree.</p> <p>We think it is important that there is a level playing field for different types of providers to operate in the HE landscape. However, we also think there should be a proportionate and risk-based approach to regulation, which these proposals do not indicate. There also seems to be some duplication with what would be assessed through the proposed IFATE approval process. We would also query whether OfS has the capacity to undertake assessment of these conditions in the proposed timescales (on the assumption that providers would need to meet these conditions before submitting their qualifications for approval by the Institute).</p> <p>A process of including criteria similar to some of those used in the IoT assessment in initial registration conditions and Quality Review Visits should be considered, rather than a new set of additional ongoing registration conditions for providers already on the register.</p>
<p>Paragraphs: 65- 70 (pp.27-29)</p>	<p>We did not answer this question.</p>

<p>15. To what extent do you agree or disagree that linking grant or capital funding to meeting the technical ongoing registration conditions would encourage providers to deliver high-quality provision?</p>	
<p>Paragraphs: 65- 70 (pp.27-29) 16. How might this work to ensure provision best meets local skills needs?</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 65- 70 (pp.27-29) 17. What specifically would additional funding support?</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 65- 70 (pp.27-29) 18. Would additional costs be a barrier to delivering high quality HTQs, why?</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 65- 70 (pp.27-29) 19. Which would be a greater priority for providers: capital or recurrent grant funding? Or both equally? Why?</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 71-76 (pp.29-30) 20. To what extent do you agree or disagree that additional non-financial support will be needed to enable providers to develop their workforce and engage fully with employers? What might examples of non-financial support be?</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 71-76 (pp.29-30) 21. We welcome ideas from respondents on: a) how providers could best allocate their existing resources to build and support capacity and delivery of approved HTQs b) where additional help may be needed c) and what providers think should be prioritised in terms of any future funding allocation.</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 65- 70 (pp.27-29) 22. To what extent do you agree or disagree that we should explore how providers that meet the ongoing registration conditions specific to Higher Technical Education could have access to a more competitive</p>	<p>Agree.</p>

<p>student finance package for courses leading to approved HTQs, than those who do not meet the technical conditions? Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p>	
<p>Paragraphs: 77-83 (pp.31-32) 23. To what extent do you agree or disagree that there is a need and opportunity for more young people and adults (including those who need to upskill and retrain) to be undertaking HTE in the future? Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p>	<p>Agree.</p>
<p>Paragraphs: 84-97 (pp.32-35) 24. In pages 34-36 we set out measures to improve the profile and prestige of HTE. We propose to ensure that HTQs have a clear product identity and are promoted through a campaign. We also want HTQs to be given the recognition they deserve in school and college destination measures and amongst employers. We will look to harness the prestige of high-quality providers and professional bodies to promote HTE. To what extent do you agree or disagree with these measures to improve the profile of HTE? Answer options: strongly agree, agree, neither agree or disagree, disagree, strongly disagree.</p> <p>Please provide any additional ideas Answer options: comment box</p>	<p>Agree.</p> <p>It will take time for the kitemark to become recognised by both employers and students and will require long-term investment from the government on measures to improve profile and prestige. As previously mentioned, we are concerned that if government-backed promotion and marketing of the kitemark happens during a phased approach to approving existing qualifications through the Institute, it will create further confusion.</p>
<p>Paragraphs: 98-112 (pp.36-39) 25. In pages 36-39, we set out measures to improve information, advice and guidance (IAG) for different groups. For young people and their teachers, we will work with the Careers & Enterprise Company, Career Development Institute and UCAS to achieve this, whilst for adults we will work with the National Careers Service and professional bodies to improve IAG. We will also improve employer understanding of HTE by working with LEPs, Growth Hubs and the National</p>	<p>Agree.</p> <p>Schools and other institutions such as further education colleges, universities and Job Centres should be able to access a map showing what education and training options are available throughout life, helping to normalise the idea of entering and re-entering education.</p>

<p>Apprenticeships Service. To what extent do you agree or disagree with these measures to improve IAG for young people and their teachers, adults and employers?</p>	
<p>Paragraphs: 113-124 (pp.39-41) 26. We want HTE to be accessible to a wide range of people and also want to make sure that the right support is available to help people to complete the course of study. In pages 39-42, we set out how we plan to encourage flexible provision for people with other responsibilities and make sure the most disadvantaged can access HTE, alongside other measures. Do you have any further evidence on what works in this space and what more government can do to improve access and help support students to undertake and complete a HTQ? Answer options: comment box</p>	<p>We did not answer this question.</p>
<p>Paragraphs: 113-124 (pp.39-41) 27. With reference to the impact assessments published alongside this consultation - Do you have any comments about the potential impact the proposals outlined in this consultation may have on individuals with a protected characteristic under the Equality Act 2010? Answer options: comment box</p>	<p>We did not answer this question.</p>
<p>28. Do you have any other comments? Answer options: comment box</p>	<p>University Alliance brings together a group of civic universities which put technical and professional education at the heart of their mission. University Alliance members are some of the largest providers of HTQs in England and Wales. For example, in 2017/18 there were a total of 1,250 HNC/HND qualifiers and 2,805 Foundation Degree qualifiers across our members. Three of our members are also partners in the new Institutes of Technology.</p> <p>We would like to note that we answered 'agree' to Question 7 rather than 'strongly agree', as the aims do not mention progression to further study. In addition to having confidence that qualifications are recognised by employers, we would like to see progression to further study included in the aims. Students should be confident that HTQ's are understood across the education system and progression routes to higher levels of taught and apprenticeship provision exist, whether immediately upon</p>

	completion of an HTQ or later in life. HTQs will not be seen as a high quality, prestigious route if they do not have this progression and transferability built in from the outset.
--	--