

UUK's response to the DfE consultation on Improving Higher Technical Education

The following is UUK's response to the DfE consultation, [Improving higher technical education consultation](#).

Question 7:

To what extent do you agree or disagree with the proposed aims of HTQs set out below?

Our vision is for higher technical education (HTE) to be a prestigious choice that delivers high levels of occupational competence and supports entry to skilled employment, for those seeking to enter industry or progress within an existing career. This means that the aims of HTQs should be to:

- a) Deliver the knowledge, skills and behaviours that are needed for an occupation(s) and valued by employers.
- b) Be understood and recognised as high-quality by employers and so have labour market currency.
- c) Give students confidence that qualifications are recognised by employers and are seen as a credible and prestigious alternative to other options such as direct entry to a degree or apprenticeships.

Answer:

Neither agree nor disagree

Question 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?

If yes please provide your views

Answer:

The higher education sector plays a substantial role in the current landscape for level 4 and 5 qualification accreditation and delivery, as has been identified in DfE's "Review of the Level 4-5 qualification and provider market" analysis. Higher education institutions account for nearly a third of all level 4 and 5 learners, with 96 English institutions delivering level 4 and/or 5 qualifications in 2016/17.

Universities UK has significant concerns on the coverage of the proposals and how they would operate in practice.

We are concerned about the implications for those qualifications which are not considered to be 'technical' for the purposes of the consultation. The funding arrangements proposed are likely to discourage study in courses outside the definition and could leave around 26,000 students with uncertain futures.¹ This could deter individuals, including those from disadvantaged backgrounds, from progressing further with their studies, with consequences for social mobility and their capacity to contribute to the economy and society. It is vital for HTQs and 'non'-technical qualifications to feature together in the government's vision for level 4 and 5 qualifications and the broader education system.

For those qualifications that are in scope, we are unclear how the 'HTQ' badge will operate – will it replace existing qualifications as and when they gain approval as set out in the proposals? Or would it be applied to existing qualifications? If the latter, how would this impact on the autonomy of higher education providers to determine their curriculum? Current qualifications such as foundation degrees, higher national certificates and higher national diplomas are trusted and widely understood by employers. We would favour an approach that retains, as far as possible, existing titles to reduce uncertainty for students and employers alike.

The process of qualification approval by the IfATE, on top of stringent regulatory requirements from the OfS, has the potential to be incredibly burdensome for universities. The qualification approval process must be as streamlined, rapid and

¹ RCU, 2018, Mapping the higher technical landscape.

clear as possible. Lessons from the apprenticeship approval process must be learned so providers are not deterred from applying. We recommend robust and practical feedback from IfATE is given to those who are at first unsuccessful to support resubmission and to avoid a prolonged approval process.

We would support the inclusion of recognised experts beyond employers in the approval process so that occupational standards can be as innovative as possible. There also needs to be clarity for kitemarked awarding organisations or providers where occupational standards are changed following IfATE's reviews (referenced in paragraph 19 of the consultation document).

Question 9:

What is your view on our proposal that, upon approval of a higher technical qualification, there should generally be no transfer of copyright?

Answer:

Agree

Question 9 continued:

What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?

[No comment]

Question 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).

Answer:

(a) A clear mark of labour market relevance

5

(b) A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)

2

(c) Enhanced support for potential students through information, advice and guidance (e.g. careers advice)

4

(d) A swift and straight forward process for submission, appraisal and decision making

1

(e) Other (please specify)

3 – Assurances that the qualifications will allow for transitions to and from further and higher education.

Please provide any specific views on points a-e.

(a) Labour relevance.

IfATE's processes for reviewing standards need to allow for emerging sectors and their skills needs, through the use of forward-looking labour market analysis, wide consultation with employers and the involvement of experts in their fields.

(b) Funding.

While we agree that funding is a very powerful incentive for the submission of qualifications for approval, we are concerned about the implications for non-technical qualifications delivered at levels 4 and 5. In the run up to a spending review in 2020, the government should consult with the sector in greater detail on what funding arrangements might apply for HTQs, whether there is an estimate or target for the number of qualifications to be approved, and how any changes in funding would impact on other areas of higher and further education spending.

(d) Streamlined regulation and decision-making process.

We are concerned about the capacity of the IfATE to deliver a streamlined process given their relative lack of experience in this type of provision, ongoing commitments in T-levels and apprenticeship standards reform, and the expertise needed for specialist qualifications. Initial piloting could help rectify any early problems, increase trust and therefore support demand for submission from higher education providers. Where IfATE lacks experience (for example in classroom-based qualifications) it should draw on outside expertise as required.

(e) Other - Assurances that the qualifications will allow for transitions to further and higher education.

We strongly believe that HTQs should not be regarded as an alternative to apprenticeships or three-year degrees but should be an addition. As well as being high-quality standalone qualifications, HTQs should be part of a system that allows students to progress on to further or higher education options. Current proposals do not adequately recognise this, and further steps should be taken to look at how students progress through the education system, in terms of the support they need financially, and the content of the qualifications offered. Individuals holding HTQs who progress on to further study will have both occupation-specific technical skills and the additional high-level transferable skills that employers currently seek from graduates.

Question 11:

Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process.

Our intention is to establish a flexible system for qualification approval. As described above, Awarding Bodies will be able to choose whether to submit their qualifications for Institute approval against a standard, with clear incentives to do so (as set out in paragraphs 29-32). This model – approval of qualifications against the knowledge, skills and behaviours in a single occupational standard – is the core model we are proposing. However, we want to understand whether there is demand for additional features including:

- 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;

Strongly agree

- 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;

Agree

- 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;

Neither agree nor disagree

- 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;

Strongly agree

- e) Other requirements: whether it would be beneficial for the Institute to require proficiency in the following, alongside HTQs;

- (i) Other requirements: Maths

Agree

- (ii) Other requirements: English

Agree

- (iii) Other requirements: Digital skills

Agree

- (iv) Other essential transferable and employability skills

Agree

- (v) Alignment with professional body standards

Neither agree nor disagree

- (vi) A period of work-based learning.

Neither agree nor disagree

Question 11 continued:

Are there any specific points you would like to raise in relation to the above. Please state below

Answer:

(a) Flexibility to include additional content.

We strongly support this. While it is important that route panels represent a diverse range of employer types, higher education providers experience significant demand from employers for the development of bespoke courses to meet local and sectoral needs. This is likely to continue, even where occupational standards are developed, so therefore this flexibility is essential. Higher education providers may also develop content to meet emerging trends and therefore flexibility to incorporate this is needed.

(c) Smaller qualifications.

While generally it would be burdensome for smaller qualifications to require IfATE approval, it could be beneficial in some specific cases where there is a market for upskilling in highly specialised topics that do not require the length of a full course to learn.

(d) Flexible learning.

We strongly believe that within approved qualifications, the IfATE should allow step-on and step-off opportunities. Universities UK conducted a study of the economic case for flexible learning in 2018² in partnership with the CBI, which recommended greater support for students moving between work and study across their lifetimes, and that the education system should support shorter and more flexible courses.

(e.iv) Other essential transferable and employability skills.

We believe that these skills should be included within the occupational standards as relevant – transferable skills are increasingly important as economic needs change with the fourth industrial revolution. We recommend that approaches already used to

²UUK, 2018, The economic case for flexible learning
<https://www.universitiesuk.ac.uk/news/Pages/Education-system-must-change-to-support-flexible-study.aspx>

assess these skills, such as those developed by QAA for academic degrees, be drawn on here.

(e.v) Alignment with professional body standards

While it will be important for knowledge, skills and behaviours to align with professional body standards as far as possible, consideration will need to be given where there are differences between what a professional body requires and what is generally required and accepted by employers.

(e.vi) A period of work-based learning.

While we agree that periods of work-based learning are useful, we believe they should not be compulsory. Offering work experience may be difficult for providers in remote regions with access to fewer or smaller employers. Similarly, relying on students to travel long distances for work experience can be costly for both student and provider and has other negative implications for inclusivity, including for students with caring responsibilities. Periods of work-based learning should only be compulsory where knowledge, skills, and behaviours cannot be acquired by other means, such as simulated environments.

Question 12:

Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements? If yes, please give your points below

Answer:

We agree that it is critically important that the system builds on the OfS's existing regulatory processes to avoid duplication and overly burdening higher education providers. The OfS's expertise is instrumental in delivering meaningful regulatory decisions and feedback.

However, some providers looking to deliver HTQs may not yet be registered with the OfS. Providers that are yet to be registered should be encouraged to work with registered providers within their region to build their capacity. UUK's 2018 report on "Routes to High-Level Skills" showed that collaboration can work to raise the quality of provision across both higher and further education.

Question 13:

Are the suggested criteria (listed below) suitable markers of high-quality technical provision?

- 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 ability to ensure provision is sustainable and retains a clear focus on quality
- 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.

Answer:

Yes

Question 13 continued:

Give reasons for why or why not

Answer:

We broadly agree that the suggested criteria are suitable markers for high-quality technical provision, but would welcome further detail on how they would be defined. We also wish to raise a concern with the proposed approach to IoTs and National Colleges being exempt from the criteria on an ongoing basis – how could quality be guaranteed? We also wish to flag that some of these requirements may be challenging to meet for providers with fewer resources.

Question 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? If you disagree what could an alternative approach be?

If you disagree please give reasons

Answer:

Neither agree nor disagree

While we understand why the government would wish to signal the quality of a provider's higher technical provision we have significant reservations about the OfS introducing a 'second' set of registration requirements for those wishing to deliver higher technical education. In the interests of good regulation the OfS should look to draw on existing evidence and information it collects from providers to support any work it undertakes on HTE. Any further requirements placed on providers should be proportionate, risk-based and subject to rigorous assessment of the costs and benefits of requiring this extra information. Introducing additional requirements could be overly burdensome and run the risk of few institutions qualifying in time for the planned launch of HTQs in 2022.

We also wish to highlight a significant concern that paragraph 54 in the paper suggests that apprenticeships at all levels are inspected and regulated by Ofsted. This is not the case for higher and degree level apprenticeships.

Question 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?

Answer:

Neither agree nor disagree

Question 16:

How might this work to ensure provision best meets local skills needs? Please provide comments.

Answer:

It is important provision meets local skills needs, as we set out in UUK's 2017 graduate retention publication.³ In this publication we suggested that government support networks of local providers, employers and stakeholders (such as Local Enterprise Partnerships (LEPs)) to better match skills supply and demand. The OfS currently funds projects developed by providers to improve local graduate retention through their challenge competition.

We have reservations about introducing additional technical registration conditions. As proposed, however, the conditions would have reference to regional and national economic growth. Ensuring a good geographical spread and diversity of providers would best meet local needs, as well as ensuring the reach of IoTs extend across the country and beyond the cities. Government could also help address barriers to collaboration in local areas and improve information sharing between providers, local stakeholders and employers.

Question 17:

What specifically would additional funding support? Please provide comments

Answer:

The funding would be used by providers to strengthen relationships and engagement with employers and local stakeholders including LEPs and local authorities to identify current skills gaps and future skills needs, and to develop innovative courses. Additional funding would also be used to attract and retain highly-skilled staff, to develop student support structures and infrastructures, which are particularly beneficial for mature and distance learners, and creating appropriate 'step-off' opportunities from a university degree which would require significant curriculum change and staff time.

³ UUK, 2017, Graduate retention: meeting local skills needs

Question 18:

Would additional costs be a barrier to delivering high quality HTQs, why?

Please provide comments

Answer:

There are areas where provision of higher technical courses is more costly than academic pathways given the need for technical training infrastructure and for staff with up to date industry-relevant experience in order to deliver the qualifications most credibly. Without funding support for the items mentioned in question 17, it would be very difficult for providers to adequately scale up provision to meet the government's ambitions.

We recommend government consult further with the sector on the costs of delivery and how funding models could be best modified to successfully scale up HTQ provision.

Question 19:

Which would be a greater priority for providers: capital or recurrent grant funding? Or both equally? Why?

Please provide comments

Answer:

Both are important, however we would emphasise that recurrent grant funding is essential for provision to remain sustainable. Capital funding is also important, to increase capacity, fund infrastructure to better support learners and to support the development of partnerships. UUK's 'Routes to high-level skills' report in 2018⁴ showed that collaborations between higher and further education are very powerful in meeting the needs of learners and capital funding would help extend the benefits of these partnerships across the country (outside of the specific IoT model).

⁴ UUK, 2018, Routes to high level skills

Question 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?

Answer:

Agree

Question 20 continued:

What might examples of non-financial support be? [Provide comments]

Answer:

Students who ‘step-off’ a three-year degree are currently counted as non-completers – even when they may have successfully completed what could be considered a level 4 or 5 technical qualification. This has a negative impact on a provider’s metrics for the Teaching Excellence Framework and league tables. This needs to be addressed if higher education providers are to increase their provision of higher technical qualifications.

In spite of many good examples of employers working with higher education providers, barriers to collaboration still exist, some of which were cited in UUK and the CBI’s joint statement on the economic case for flexible learning.⁵ There is a continued role for government to work together with providers across further and higher education and employers to support collaborative activity, particularly at the local level, improving intelligence and information sharing on the local skills needs of employers.

The potential for greater collaboration between further and higher education should also be examined further – UUK’s ‘Routes to high-level skills’ report in 2018⁶ illustrated that higher and further education collaborations work well in practice to best meet the needs of learners. It would be valuable for government to consider regulatory mechanisms and other incentives – that go beyond the IoTs - to support

⁵ UUK and CBI, 2018, The economic case for flexible learning – joint statement
<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2018/joint-uuk-cbi-statement.pdf>

⁶ UUK, 2018, Routes to high level skills

these valuable collaborations between higher and further education and to encourage more of them to develop.

Question 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,

See our answers to questions 17 and 18.

- b) where additional help may be needed,

The requirement proposed in paragraph 61 of the consultation document for HTQ providers to provide access to specific learning environments may cause difficulties for some smaller or more remote organisations. With the support of DfE and local authorities, networks, partnerships, or consortia could be established as a possible route to sharing resources and connections with employers.

- c) and what providers think should be prioritised in terms of any future funding allocation.

See our answers to questions 17, 18, and 19.

Question 22:

To what extent to 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 student finance package for courses leading to approved HTQs, than those who do not meet the technical conditions?

Answer:

Agree

Question 22 continued:

Why?

Answer:

We have reservations about introducing additional technical registration conditions. However, as noted in our response to question 18, there are areas where provision of higher technical courses is more costly than academic pathways. Therefore, we recommend government consult further with the sector on the costs of delivery and how funding models could be best modified to successfully scale up HTQ provision.

Question 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:

Agree

Question 23 continued:

Please provide examples from your experience:

Answer:

Undertaking HTE presents significant opportunities to those who currently have level 3 as their highest qualification (around 26% of twenty-five year olds in England⁷) as well as to those who are either in or out of work to retrain and upskill. As set out earlier in our response, we strongly believe that HTQs should not be regarded as an alternative to apprenticeships or three-year degrees but should be an addition.

⁷ DfE, 2018, Post-16 education: highest level of education by age 25

Learners should be empowered to make the right decision for them and should be fully informed that undertaking a HTQ can progress on to a full degree afterwards or later in life. We would stress the importance of an aligned strategy for skills that underlies initiatives in post-16 education for both young students still in education and for adult learners.

In terms of specific skills, digital skills are becoming increasingly relevant for a wide range of industries, with the majority of roles expecting candidates to have “baseline” abilities (see DCMS’s 2019 report, “No longer optional: employer demand for digital skills”). Therefore, as reflected in our response to Question 11, we see the importance of digital skills being recognised in the delivery of HTQs.

HTQs must also incorporate high-level transferable skills such as time-management and communication, which are routinely linked to difficulties employers face filling job vacancies (see DfE’s 2017 “Employer Skills Survey”). This would help maintain the currency of the HTQ and increase the flexibility of their career pathways.

Question 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:

Agree

Question 24 continued:

Please provide any additional ideas

Answer:

We agree with the measures taken to increase the profile of HTQs and technical education, though recognition of HTQs will require sufficient time and investment.

Engagement with employers is essential for reaching both adults already in work (for whom they will often be paying the fees) and for young people (for whom employers' recognition of qualification value will be crucial in their decision-making process). Increasing employer demand will require instilling a deep understanding of what these levels of qualifications can offer them. As mentioned in our answer to question 8, employers are already very familiar with existing qualifications such as foundation degrees, higher national certificates and diplomas so we would favour an approach, as far as possible, to build on the knowledge of existing titles.

We would also prioritise communicating to learners how their education paths could progress and the flexibility that is possible in the routes they take – this could mean HTQs build on the strong brand recognition of A-levels, apprenticeships and degrees. All communications should be as tailored as possible – to young people and adults, to those in and out of work, and to those retraining.

Question 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 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?

Answer:

Agree

Question 25 continued:

In what other ways could we help fill the HTE information gap for: Young people & their teachers.

Answer:

Information for students must be tailored, authentic, and communicated through channels they recognise. Our research on degree apprenticeships found that this was an important part of boosting awareness and demand from a diverse body of

prospective students (see UUK’s 2019 report, “The future of degree apprenticeships”).

Any approach must target awareness at the early stages of secondary education or earlier. Decisions about whether to go onto higher education even at age ten are predictors of their decisions later in life (see UCAS’s 2016 report, “Through the lens of students: how perceptions of higher education influence applicants’ choices”). Early intervention is vital for HTQs to be recognised by prospective students as a viable option.

We recognise that building effective information channels in schools is particularly difficult where most teachers will have themselves been through the academic degree system and have no personal experience of HTQs. At a minimum, teachers should be provided with resources to help improve their own understanding and in communicating the options to their students.

Universities can play an important role when in engaging with students and employers, as they often have well-established networks with both.

Question 25 continued:

In what other ways could we help fill the HTE information gap for: Adults

Answer:

Engagement approaches should also target adults both in and out of work. Adults are more likely to need to balance their learning with other life commitments – be it employment or caring for family members. Therefore it will be important to emphasise in the information provided how undertaking HTE can fit in alongside their ongoing commitments. In UUK’s work on flexible learning in 2018, a survey of those who considered but ultimately decided against studying part-time found that after financial reasons, the next most common reason for not studying was that the course would not have fitted in with their personal life or employment situation.⁸

⁸ UUK, 2018, Lost learners

Question 25 continued:

In what other ways could we help fill the HTE information gap for: Employers

Answer:

Individually, SMEs have limited time and resource to dedicate to understanding a new qualification system. As they make up 60%⁹ of private sector employment, however, they are an important audience. Use of employer associations and representative bodies at local and national levels and covering all sectors could be an effective route to access them. Universities and colleges often have well-established networks of local employers particularly for those relevant to the courses they already provide.

Communicated information should be transparent, jargon-light, and ideally tailored to the industry or role.

Question 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?

Please provide comments below

Answer:

As set out earlier in our response, we believe that learners should be empowered to make the best possible choice that fits with their personal circumstances, and that they should be informed that undertaking a HTQ is not an alternative to an apprenticeship or three-year degree but that they can progress further should they wish to. Some individuals from disadvantaged groups may wish to pursue 'non'

⁹ BEIS, 2018, Business population estimates for the UK and regions

technical routes and information on these options should be equally provided alongside technical routes.

Learners who require flexibility will need to be supported by the student finance system – therefore this consultation needs to consider if student support will be available for smaller credit modules. Learners also need support from their provider in how their course is delivered. This can mean substantial upfront costs for providers including on staff training, changes to IT systems and development of student support. While excellent examples of flexible learning exist, UUK’s work on the economic case for flexible learning in 2018 identified the barriers to scaling up more flexible provision. UUK will be working with employers, government and providers to set out the practical next steps to move towards a more flexible system, and we see this work as highly relevant to the development and communication of HTQs.

Question 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?

Please give reasons for your answer

Answer:

The impact of HTQs on provision of non-technical courses and their student base will need to be assessed further as processes are defined. While some of these students may benefit from an HTQ, reducing options that allow students to access academic degrees or other non-technical qualification may be incredibly damaging for student choice and inclusivity.

Question 28:

Do you have any other comments?

Answer:

We would like to see more information about how the government will assess the success of the initiative. The evaluation process should be initiated during its pre-launch phase. Ideally, we would like outcomes measured to factor in the economic and social mobility benefits of upskilling as well as to measure the additional costs of implementing new processes.

We would also like to provide some clarification for our response to question 7. We agree that HTE qualifications should be able to deliver high-quality occupational knowledge, skills and behaviours that are understood and recognised by employers. However, we disagree that HTQs should be developed and promoted as 'alternatives' to degrees or apprenticeships.

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