



About GuildHE

GuildHE is one of the two officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private sectors. Member institutions include some major providers in professional subject areas including art, design and media, music and the performing arts; agriculture and food; education; health and sports.

Consultation Questions

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

Agree

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?

GuildHE agrees that more can be done to improve the prestige of HTQs. Our members proudly offer the majority of their provision as technical and employment-focused education. Many other HE and FE providers also have a long history of delivering high quality technical education, yet often these qualifications are misunderstood by the public and suffer from the stigma that technical education below degree level is less distinguished than a full bachelors degree. The sheer number of qualifications categorised as a HTQ, coupled with large numbers of adults undertaking them and massive cuts to school careers guidance has meant that there is little IAG about these courses, unless PSRBs are actively engaged in promoting them. Not all industries have active skills groups promoting industry-relevant qualifications, and we hope that this new approach may encourage more to engage. However, from our experience of the changes to apprenticeship provision, there are still many employers who have no understanding of L4/5 qualifications, or little interest in helping to design KSBs and Occupational Standards that meet their needs.

Where L4/5 works well at present is where the industry representative body, and/or PSRB work with Awarding Organisations and HE to develop qualifications, with the awarding body taking the lead. We don't necessarily see how the proposed changes will encourage more industries to engage, and are concerned that new processes may undermine current good practice. For example, we have already seen IfATE go against the wishes of long standing and reputable PSRBs in the decisions it has made on Apprenticeship provision. We would not wish this to be replicated in HTQs, especially where there is very little experience of Higher Education delivery or development within IfATE staff or route panels.

We also wish to convey caution with the notion that qualifications must only align to the KSB and Occupational Standards. A qualification is more than training for a specific job. It is an internationally recognised award of learning which prepares the award holder for a specific career, not just one job. The aim of the apprenticeship programme is to provide specific 'on the job' training, and we would not want IfATE restricting learning to the same degree it has with Apprenticeship standards.

We believe there should be a choice as to whether an awarding body decides to put forward a qualification for approval. However, universities that offer L4/5 should be exempt from any financial sanctions for not having their award kitemarked. This is because HE uses L4/5 in very different ways, and some delivery is not classed as Technical Education. We would not want any non kitemarked HN/Foundation Degrees to have their funding removed as they are widely used in supporting students from less traditional backgrounds to access HE, who often then go on to top-up their qualification to a degree. It would also go against the Augar recommendation for universities to routinely offer step off points from degrees for all of its programmes.

We think the idea of a kitemark to distinguish IfATE approved qualifications will succeed in helping students pick courses with direct employment opportunities, and will be especially helpful in the QCF aligned market, which is very crowded. However, HE provision is already regarded as high quality and prestigious and our members directly work with industry, both to design the courses and often to teach on them. GuildHE recently published a report outlining our members' approaches to Practice Informed Teaching which can be found here <https://guildhe.ac.uk/wp-content/uploads/2018/11/Practice-Informed_Learning-_Final_Nov_18.pdf> . So, whilst the kitemark will add some value to what we offer, it should not aim to undermine our rich history of delivering high quality provision, nor be seen as a gateway to that provision.

We have particular concerns about the narrowness of the 15 Technical routes. They are not a coherent set of occupational standards in some areas, with many employers not willing to participate in developing additional ones. We are especially troubled that the Creative and Design Route contains no performance related occupations (dance/acting/music etc) which are clearly skilled and highly technical professions. The creative industries, sport and agriculture sectors also have a strong history of self employment, or are principally SME dominated industries. Therefore, it is challenging to develop trailblazer groups in these hugely diverse, but important sections of the economy. IfATE could do much more to encourage employers to work together on standards. We are also concerned that Trailblazers and Route panels contain very few people with experience of designing and delivering HE qualifications, especially those aligned to the FHEQ. We would be concerned about their ability to judge HTQs without an in depth understanding of Higher Education quality and delivery including the FHEQ and subject benchmark statements.

We have additional concerns that the current trailblazer and route panel process is very secretive and exclusive. This creates unnecessary barriers to other groups forming, or delivery providers planning for future delivery. We wish IfATE to have a publicly accessible list of trailblazers (and the members of each trailblazer) as well as the occupations standards being developed and the stage they are at. That way, if an employer group is interested in developing a new one - or wishes to contribute to current discussions, it would more easily

be able to look up the information. At present until the publication stage, not all employers will be aware of the development of a standard and may find the approved standard not useful to their business. This is especially true in sectors with little or no national skills oversight body.

Finally, and as an outcome of four discussions at the consultation events, we think it would be useful to engage with students and employers to test out names for the new kitemark – though we believe HTQ would be an appropriate phrase to describe the qualification you are kitemarking (and is a ‘new phrase’ in the sector). We would be happy with this as the name of the kitemark in a phrase such as ‘Approved HTQ’.

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

Agree

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

We believe that there should be absolutely no transfer of copyright to IfATE unless there is no awarding body/HEI offering a similar qualification. With an employer led market, it should be up to local LEPs to work with their local HE/FE providers, and for those providers to use their local business connections to decide what types of courses would be delivered. Because of this, we hope that decisions around kitemarking will be quick and efficient so as to enable HE/FE institutions to quickly meet local need. At present, the apprenticeship process takes far too long, is incredibly bureaucratic and does not appear to understand the language or systems of the HE sector.

We see no reason why IfATE would become a copyright holder of a certain qualification. If the employer demand is there, a qualification will always be in existence. However, it would be useful for IfATE to publish an up to date list of qualifications against each occupational area for prospective suppliers to monitor the market.

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).

Please select - 1 Most important:

d. A swift and straightforward process

Please select - 2:

c. Enhanced information, advice and guidance

Please select - 3:

other (please specify): support for new provider engagement

Please select - 4:

a. A clear mark of labour market relevance

Please select - 5 Least important:

b. A competitive funding package

Please provide any specific views on points a-e.:

A clear mark of labour market relevance:

It is important in some areas to show additional labour market relevance, where there is little explicit IAG for prospective students to understand employer expectations. However, we find that the majority of students who attend our HE and FE members already have a good understanding that the technical qualification they are taking is relevant to the industry they wish to enter. There may be a number of reasons for this, including that our member institutions are already well established and trusted institutions who are well connected to, and understand, their industry needs. The kitemark could help providers who do not have the same level of reputation, or for qualifications that are not as well known.

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

We believe that all qualifications that align to the FHEQ should be eligible to receive the same additional T-Funding as full time degrees. However, we would not wish to see a large number of additional QCF mapped qualifications receive this T-funding uplift without the same level of regulatory scrutiny. For example, to charge £9+k and access T-Grant, providers have to submit access and participation plans, student protection plans and subscribe to HESA, QAA and the OIA. It would not be acceptable for other providers to have access to funding uplifts without also committing to these terms. However, we can see why it may be good for students to have access to student loan funding for some of these courses, making them more accessible and more affordable. We think that in some cases it may be acceptable for a QCF aligned qualification to have similar access to the student loan book (but at the £6k price point on the same terms as 'approved' OfS providers) without being a proper member on the OfS register. However, the provider should undergo the same monitoring and new conditions for HTQs, but overseen by the ESFA/Ofqual processes as is the case now, and have no access to T-Grant and other public money.

We know that some FE colleges have chosen not to register themselves on the OfS register, but still have access to student loans through their partnerships with the HEI that validates their award(s). We would wish for this arrangement to continue with HTQs. With Awarding Bodies, regulation is a little different. We think OFQUAL and the OfS should work together to decide on a new approach for quality assuring the awarding bodies who own kitemarked HTQs, just as universities must have oversight of their collaborative provision. We believe this will make a huge difference to the quality of QCF aligned higher awards and ensure greater parity between the two frameworks.

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

This is essential if this policy is going to succeed in bringing in more students. We have said on many occasions to the DfE that the removal of funding for schools has left the state of careers education and advice in a parlous state, with many schools not having the capacity to offer any meaningful support for young people at all. Similarly, there is inadequate advice and guidance for adults thinking about their career trajectories. We believe this in part has led to the increase in take up of degrees as they are a qualification well understood by employers and the public. At present, much of the IAG comes directly from education providers, through prospectuses, open days and local outreach activities. Employers, and

education providers could offer better quality advice if there was a national commitment to IAG for all, with funding attached to help communicate local area needs and typical routes into industry.

A swift and straightforward process for submission, appraisal and decision-making: This is vital, and is lacking from the current Trailblazer/Route Panel process. The current approach is also heavily prejudiced against HE provision aligned to the FHEQ, and is impenetrable to many HE providers. IfATE severely lacks understanding and expertise of HE, its processes and its quality arrangements. It has also in the past enacted policies which harm HE engagement in technical education. If IfATE is to continue to judge HE provision for quality it must improve its relationships and engagement with HE providers and representative bodies and act in the interests of both the education sector and employers collaboratively. We would like to see more HE experts engaged at all levels of IfATE and its processes, and for it to be more transparent in its decision making and how it communicates with the whole education sector. It also needs to ensure it is working effectively with students, and working in the student interest, something which is a major expectation of the HE sector.

We would like there to be a documented appeals process should a qualification be rejected, which should include the ability for employers, HE institutions and/or industry skills bodies to submit their views.

Other (please specify):

We recognise that funding is a key driver in the engagement of new qualifications and ways of working. We think the Degree Apprenticeship Development Fund was somewhat successful in encouraging more universities to engage in developing Degree Apprenticeship provision. However, the funding went exclusively to those who already had provision in this area, and there was very little money dedicated to boosting new areas of engagement. It is very expensive to develop new programmes, especially when it is necessary to work with employers. We want HE institutions to have access to funding to support their work in developing new programmes for kitemarking and to support them to submit qualifications they already run. This money should be particularly targeted to rural, coastal and northern regions, and other places where educational engagement is at its lowest.

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

a. Flexibility to include additional content.:

Strongly agree

b. Broader qualifications:

Agree

c. Smaller qualifications:

Agree

d. Flexible learning:

Strongly agree

(i) Other requirements: Maths:

Strongly disagree

(ii) Other requirements: English:

Strongly disagree

(iii) Other requirements: Digital skills:

Neither agree or disagree

(iv) Other essential transferable and employability skills:

Strongly agree

(v) Alignment with professional body standards:

Strongly agree

(vi) A period of work based learning:

Disagree

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

We believe it is important to be as flexible as possible whilst maintaining the quality standards of a higher level award. If awards are to receive public money akin to other university qualifications, they should align to the FHEQ, unless there is a justified reason not to. This includes number of hours and credits. Having a qualification which meets more than one occupational standard, or less than one should not always be seen as a negative, nor should there be a restriction on the ability of providers to deliver the award in segments or in other flexible ways. Where it is unable to meet the full KSB it could rightly be because it is a highly specialised part of the occupation. As long as there are genuine pedagogic or industry required reasons why a qualification might not fully comply with the standard FHEQ definition (which are evidenced) the award should be kitemarked.

We do not believe that mandatory Maths/English/Digital skills have a role in Adult Education at a Higher Education Level. This skills will be included where appropriate for the job role.

We also believe that 'on the job' training takes many forms, and mandatory work placements would be prohibitive to some providers offering these courses. Instead, other industry connections can be utilised (as is already the case in HE) such as live briefs, practitioners as lecturers and community knowledge exchange projects.

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:

There is much confusion still in the HE and FE sector as to how level 4 and 5 is quality assured, and how it will continue to be in the future. At present, the current arrangements are discouraging providers from delivering higher and degree level apprenticeships. We want the OfS and ESFA/OFQUAL to work far more collaboratively, and transparently with each other to support the success of this policy. We do not think it appropriate to force all FE institutions to join the OfS register, and neither should HE providers delivering HTQs have to join an ESFA register. This would be overly bureaucratic. Providers should be allowed to

continue with their current arrangement, but have the same additional conditions as suggested, monitored by their respective regulators. If DfE insist that there continue to be QCF and FHEQ aligned qualifications for kitemarking, this is the only fair way to regulate providers without additional and unnecessary burden. However, we think this arrangement should only cover additional access to the student loan book for kitemarked courses, and not for T-Grant funding, or where the provider's provision is more than 50% HE. Then they should be required to join the OfS register to access the funding which will preserve the fairness of the dual system.

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

No

Give reasons for why or why not:

As above we suggest that the provider registration for the OfS or ESFA should remain broadly the same as present and DfE should not force FE and private training providers to go onto the OfS register, unless over 50% of their provision is at L4+. But, we do think that regardless of whether you are on the ESFA or OfS register, you should have to comply with the same conditions of monitoring technical provision. This should include showing links with employers, relevant industry organisations and local skills bodies, adequate equipment for teaching relevant practice and showing your approach to teaching industry relevant skills. However, the TEF process has shown us that there is not a good and reliable measure of who is considered a suitably qualified teacher. Those with formal teaching qualifications are not always industry relevant, and some industry workers would not be good teachers. It is not a requirement for lecturers to hold formal teaching qualifications in HE, and we would not wish to see this introduced. Instead, providers should provide evidence of staff team abilities to teach industry relevant content in whatever way they choose. Our members are proud to use a mixture of academic, research based and industry practitioners on their teaching teams to provide the best quality specialist education, but we have no uniform way of doing this and would not wish innovative teaching approaches to be stifled for the sake of metrics.

There is an ideological tension here between what is proposed, and how the OfS currently regulates HE more broadly. OfS believes that providers should be regulated against outcomes, and not how they deliver courses. We suggest that HTQ kitemarked provision in HE should also be measured on outcomes, and whilst we welcome a renewed interest on finding good practice in delivery, we are not sure how OfS would routinely collect this information from providers without additional administrative burdens on providers.

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:

Higher education providers on the OfS register already deliver a variety of qualifications that are both academic and industry relevant and meet baseline quality requirements, together with ongoing conditions of registration. HE is an internationally respected sector and these qualifications already form part of how the OfS monitors providers. We do not want to have additional regulatory burdens and costs placed upon the HE sector to deliver kitemarked qualifications which in practice we already accredit and deliver ourselves, or with our FE partners. QCF aligned qualifications may need a different approach as they are not monitored in the same way. We would however agree that HE, FE and Private Training

Providers delivering these courses should be regulated against the same benchmarks, and non-HEI awarding organisations should be held accountable in the same way as university awarding bodies.

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?

Agree

How might this work to ensure provision best meets local skills needs?

Capital funding may help support those providers with less provision or equipment engage in delivering certain HTQs, but we do not believe this money should be available to those not on the OfS register, or in the case of FE colleges this money should be distributed through current capital funding mechanisms. Local areas should bid for the additional funding in partnerships between employers and educational institutions to show the genuine need for improved teaching resources or the creation of new facilities to plug a gap.

What specifically would additional funding support?

As above, the money could be used for updating equipment, creating new teaching spaces, or improved campus facilities, as well as potentially the development of online learning to reach education cold spots.

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

For many providers yes, if they do not have a history of delivering this provision already, or wish to branch out into new areas. We think the kitemarking process will inevitably be an expensive process, and an additional regulatory burden for HE providers.

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

This depends a lot on the type of provision. If a lot of specialist equipment required capital funding this route may be more important. If a lot of more expensive industry staff are required to teach the course, or there are a large number of non-traditional students on the programme, then recurrent funding will be more important. The current approach to HE funding is an appropriate methodology which covers both of these points.

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?

Agree

What might examples of non-financial support be?:

Yes - we agree that there are many things that DfE/IfATE can do to help promote engagement in this policy area. This includes working with employers without national skills organisations to help articulate their needs, and help them through the trailblazer process.

Promoting the high quality nature of HTQs to win over employers who are disinterested will also be important. Ensuring there is greater transparency over who is currently working on occupational standards will also help improve the quality and quantity of the standards.

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.

Our members have a long history in working with employers to develop courses which meet their needs. It is very resource intensive and complex work, and the provider needs to be truly committed to the task in order to deliver high quality and relevant technical education. It requires intense partnership with industry bodies, local employers, industry leaders and LEPs to get this right, and not all technical training directly links to local recruitment. Often in our experience technical qualifications often lead to self-employment or contract work and we must also prepare students for this form of working. For our members, there is a whole institution approach to technical education. It is not just centrally managed by a 'business engagement manager' or 'technical education lead' but it embedded right through to the teaching staff on the programme. To develop engagement in this type of HE, providers need to be cognisant of this and commit to encouraging all staff to actively engage in their industry, either through applied research or recruiting current practitioners to support learning.

We would like to see funding going to providers who can demonstrate a strong commitment to serving their relevant industries and can deliver a very high standard of education. We don't believe the current OfS metrics, especially those on employment outcomes fully represents what high quality technical education looks like, especially as salary data is not representative of the quality of the training provider. Employers and industry bodies should also have a say in the quality of the training provider. Some industries already do this through accreditation, but other industries have less obvious approaches, or are not actively engaged. We believe that additional funding should be targeted towards industries which are highlighted in the industrial strategy as key growth areas, where employers have identified shortages, or where Brexit will/has caused these shortages. Key sectors such as agriculture, the creative industries and construction have been identified by our members as needing more investment, as well as public services especially in healthcare. But the work is not just about developing new qualifications, it must also be about encouraging the public to think of these areas as genuine, secure and enjoyable professions. We know through our access and participation work that rural and coastal regions have different needs to cities and large towns, but to diversify students working in agriculture for example and to train enough people to meet the skills needs, a national approach to outreach is required to encourage those from urban settings to think about careers in the rural industries. Similarly for the creative arts, much of the outreach work is asserting the creative industries as a thriving career opportunity and professionalising creative skills.

As noted elsewhere there are a number of employers and industries that have neither the time or inclination to engage in developing technical education to meet their needs. We therefore believe funding should not just go to providers developing new qualifications, but to help employers better understand their skills needs in order to articulate their requirements for future curriculum development. There are a number of very large holes in the current technical standards, these must be worked on to get a coherent offer to the public who want to undertake a HTQ rather than a traditional degree. At present, the default for many

employers is that a Degree is the highest quality of education, and they are happy with recruiting graduates with non specific skills, rather than develop a HTQ for their specific profession. Government therefore also needs to recognise that 'academic' qualifications can often also meet employer needs, and it may not be able to force employers to engage in HTQs.

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

Disagree

We agree with the proposal that kitemarked courses that would not traditionally be funded through the loan book be able to acquire such support for students. But we do not think that qualifications aligned to the FHEQ that are not kitemarked should be restricted from the current funding situation. Firstly, this is because HE funding is complicated enough, with many students not understanding how it works. Secondly, it would be impossible for IfATE to truly define a Technical Qualification where HNs and FDs are already a feature of the FHEQ and are used for 'academic' areas too. Finally, it should not be possible to allow QCF qualifications to receive more than 6k without the provider also having to register with the OfS and meeting the full conditions of registration. In the interests of securing high quality academic standards and protecting public money, those not on the OfS register should not have access to any other financial grants or top-ups other than access to the 6k student loan.

To simplify what gets access to funding and T-Grant we think it is easier to say that those technical qualifications (on the QCF) will not receive student loan book access unless they are kitemarked, and will not receive T-Grant unless they are fully on the OfS register as a fee-cap provider. Those providers already on the OfS register would not need their courses to be kitemarked in order to receive funding for FHEQ aligned L4/5. That will provide an appropriate incentive for private training providers and awarding organisations to get their qualifications approved without penalising HE provision delivered by universities with their own DAPs, and which is often franchised to FE colleges.

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?

Agree

First of all, all eligible students for these programmes will be over 18 and therefore adults. The difference between those entering HE straight from school and those who have come from the workforce is the IAG available to them. Even so, the erosion of careers guidance at school has led to misinformation and missed opportunities for making the right choices post 18. As we have said elsewhere the new default at 18 seems to be either go to university or get a job. There is, of course, a need to ensure that these options are the right one for the individual, especially if they have a profession in mind. So if there was better IAG, we believe more may wish to undertake a HTQ, rather than a full Bachelor's Degree, but only where the industry body is fully supportive of the qualification.

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?

Agree

We agree these are all important areas, however, there are no quick solutions to these problems. IAG can be better supported by the school system, but employers need to take more responsibility in this space too. The trailblazer process has shown that some employers are more willing than others to engage in this activity.

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?

Strongly agree

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

Direct employer endorsement and more time/money for schools to deliver high quality careers advice and guidance.

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

For there to be better information on employer industry body sites about the qualifications required for the roles.

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

You must encourage employers to take on more responsibility for signalling their skill requirements

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?

We don't think at a HE level the government should be regulating providers based on their delivery model. There will be different flexible approaches for different types of students and different types of industry. HE providers who deliver technical education already have appropriate flexible models in place. We don't think IfATE have a role in deciding on a delivery model in any circumstances. If there is a need to run courses over longer/shorter

periods of time, over weekends, evenings etc it should be up to the provider, student body and regional employers to decide this.