



ASSOCIATION  
OF COLLEGES

# Level 4-5 Consultation

Written evidence submitted by  
Association of Colleges

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## Summary

AoC welcomes the increased attention of the government to Level 4/5 education and supports the review of level 4/5 which aims to increase the uptake of higher technical education in England. While we agree that the uptake of level 4/5 is low and HTE has a low visibility and weaker profile in contrast with Bachelors' degrees, we feel this should not be widely attributed to poor quality of level 4/5 provision. This is not to suggest that all level 4/5 provision, wherever it is taught, is high quality, however, clarity is required on whether quality in this context refers to academic quality and standards. FE colleges deliver good quality HE and this has been signalled by the outcomes of QAA reviews and Ofsted ratings and more recently through OfS regulation.

College HE is characterised by local, employer responsive, technical and professionally relevant provision, and widening participation is at the heart of college HE. This does not mean that there is no room for improvement. Colleges have been considerably under-funded for decades and in order to better meet the needs of the economy and the learners, colleges can deliver even better quality and focussed HTE provision through better access to learning resources, up to date and specialist facilities, attract teaching staff with industry relevant experience and through investment in other areas.

The consultation includes proposals for kitemarking HTQs and better funding for HTQs. Kitemarking of HTQs needs to be considered carefully as this can lead to a more confused landscape of level 4/5 provision. Proposals for better funding for HTQs can also have unintended consequences, for instance, lower cost of level 4/5 provision that is not kitemarked might make these a more attractive option for students from disadvantaged backgrounds.

There is a proposal that additional conditions of registration with the OfS should be required to indicate high quality of the HTE provision. We do

not feel the requirements should be stricter for HTE than for undergraduate degrees or other level 4/5 provision. We feel additional set of ongoing registration conditions to deliver HTQs will disincentivise colleges to deliver HTQs. We do support the principle that grant or capital funding should be provided for HTQs and additional funding will lead to better quality overall and help raise the profile of HTE.

**Q1. To what extent do you agree or disagree with the proposed aims of HTQs set out in paragraph 9 above?**

A1. We strongly believe students of all age groups should be able to make well-informed choices about their HE study- apprenticeships, classroom-based HTE, other sub-Bachelor provision as well as undergraduate degrees. Degrees have for long been treated as the gold standard and it is an 'all or nothing' position for many students. We feel HTE should be seen a genuine and credible alternative to undergraduate degrees and students should have access to clear IAG to help navigate the options available to them.

We broadly agree with the stated aims of HTQs although we feel alongside the other stated aims, HTQs should also aim to enable progression at level 6 to ensure those who choose the higher technical route have clear pathways to study at levels 6 and above, if they wish to do so.

This would help students choose HTQs with confidence that this route will not limit their future options and help with their decision making. It must be noted that all students may not have the aspiration to study at level 6 or 7 when they commence their studies at level 4 but they may decide to study further after having completed their level 5 qualifications.

We feel HTQs should offer clear articulation to the top-up year and all HE providers accept them as a credible route into level 6. Therefore, we strongly feel that HTQs should be accepted and valued as exit qualifications in their own right as well as offer clear opportunities for progression to level 6.

We agree that HTQs deliver the KSBs that are need for an occupation(s) and valued by employers, however, there is not sufficient detail in the consultation to fully understand the underpinning processes for IfA approval and kitemarking. It seems the fundamental principles will be the same as those for apprenticeships, although we feel that the KSBs that can be achieved through apprenticeships cannot be identical to those delivered through classroom-based education. It is also not clear whether qualifications that are part of apprenticeship standards in higher technical areas will automatically meet the criteria for HTQs. We also feel that while HTQs should prepare learners for a set of occupation(s), the focus of these qualifications should not be narrow so the future opportunities for HTQ graduates are not constrained.

**Q2. 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?**

A2. While we agree that it should be voluntary for awarding bodies to submit their qualifications for approval, because qualifications will continue to hold their current titles, it can be challenging for students and employers to differentiate between approved and non-approved qualifications at level 4/5. For instance, a university or college that offers two Foundation Degrees with similar titles one of which is approved by IfATE as a HTQ and another that is not, can cause confusion for different stakeholders. The key here is branding and messaging of HTQs and the

title of qualification. There is a risk that a Foundation Degree will be seen as a 'Foundation Degree', regardless of whether it is an HTQ or not. Also, it is important to note that not all qualifications at level 4/5 (such as those in Arts) are technical in nature so they will inevitably not qualify for the HTQ status, which may not necessarily imply that those qualifications lack quality or are not valued.

We agree that currently there is no consistent national approach to ensure that HTQs meet employer needs and it seems logical that IfATE takes the lead in approving HTQs. However, we would like to raise a series of points that relate to the process that underpins the approval.

Submission of qualifications for approval is proposed to be optional, although funding incentives will act a strong lever for awarding bodies to submit qualifications. Further detail is required on the process and approach that will be adopted by IfATE in assessing qualifications to ensure there are no unintended consequences of implementing this approach. For instance, existing qualifications that are already established and recognised do not fail to obtain IfATE approval else it will undermine the confidence in the process. Also, the process should not be overly complex and bureaucratic to discourage submission of qualifications. In other words, the benefits of increased funding should not be outweighed by the complexity of the process.

It is also important to note that, in the main, colleges do not award their own qualifications. There are currently 8 colleges that hold DAPs and colleges (with or without DAPs) deliver qualifications validated by universities and/or those owned by external awarding organisations. The decision to submit a qualification for IfATE approval will rest with the validating universities or awarding bodies, however, it appears that the quality conditions of HTQ delivery will apply to the teaching institutions. For instance, while an awarding body may be incentivised by funding

and seek IfATE approval, a partner college may not wish to deliver the HTQ if this was to be accompanied with a requirement to meet additional OfS registration conditions.

As stated earlier, classroom-based qualifications and apprenticeships are unlikely to offer an identical mix of knowledge, skills and behaviours set out in an occupational standard. It should be carefully considered and assessed whether qualifications that are part of an existing apprenticeship standard, should automatically be granted the HTQ status. We feel it should be expected and accepted that some standards will apply to apprenticeships only and classroom based HTQ option may not suitably prepare students for some occupations and vice versa.

Also, we feel the process should take into consideration the lessons learned from the apprenticeships process, especially during the development of occupational standards by trailblazer groups. We agree that employer voice is paramount, however, it is important to involve providers in the development of these standards.

Amongst other criticisms, trailblazers were criticised for being dominated by large/macro employers, vested interests of some employers, and for narrowing of standards for overly specific roles. There is also a question on the currency of the occupational standards- further detail is required on the process that IfATE will use to keep these standards up to date.

There is an indication that approval will be reviewed on a regular basis, which will be crucial to maintain the currency of HTQs. Understandably, there is not much detail in the consultation, however, it will be crucial to learn from and build on IfATE's experiences in reviewing apprenticeship standards. We feel qualifications and the standards should be reviewed periodically, for instance, reviewing them every three years.

It is proposed that awarding bodies are able to put forward any qualification for approval against one or more standards. We agree that one qualification may align with more than one standard, however, there is a need for a balance between over-generalisation and over-specialisation. A qualification aligned with too many standards may risk a lack of specificity however we believe that a qualification aligned with more than one standard may helpfully signal that it is preparing individuals for a wider choice of occupations.

We also feel that if no qualifications are submitted against an occupational standard or if no qualifications are assessed to successfully align with an occupational standard, IfATE should take the lead in encouraging awarding bodies to help develop new qualifications. Additional incentives should be provided to awarding bodies to fill the gap areas.

Smaller awarding bodies may be particularly disincentivised in investing in the design and development of new qualifications to fill any gap areas because the outcome of their submission will not be known until a much later stage in the application process. We suggest that in case of priming the market for certain qualifications, IfATE should engage early on with the awarding bodies so they do not invest heavily in the development of qualifications that may not be successful in obtaining HTQ status.

We have additional concerns relating to the timeline for these proposals. It is proposed that HTQs will be ready for delivery from 2022 which raises some questions relating to capacity, particularly for IfATE. If the introduction of HTQs will follow a similar phased approach as T-levels, this will result in some early winners and losers. Qualifications that obtain HTQ status will benefit from better funding in contrast with those that may either be waiting for an outcome or qualifications that may not be aligned to the first set of occupations identified by IfATE/DfE.

Also, a swift process will be necessary to generate and sustain employer interest in HTQs. One of the shortcomings of Foundation degrees has been the time required in the design and development of these qualifications. It is common to expect a lapse of 18 months before a degree is ready for delivery from the time of conception. It is important that providers are able to speedily deliver any newly developed qualifications that will have been designed in conjunction with local and regional employers and IfATE approval should not delay the delivery of these qualifications. Therefore, a streamlined and fast process of approvals will be important to generate and sustain the interest of awarding bodies in submitting their qualifications.

**Q3. What is your view on our proposal that, upon approval of a higher technical qualification, there should generally be no transfer of copyright? What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?**

A3. We agree that, in general, requiring transfer of copyright could disincentivise awarding bodies to opt in. In particular, where awarding bodies may invest in developing and designing qualifications for a niche area.

That said, we also agree that in some cases it may be appropriate for copyright in the relevant course documents to transfer to the Institute. The approach to setting this criteria will be the key in striking a balance so that awarding bodies are not disincentivised however there is continuity in the HTQ market in instances such as when an awarding body becomes insolvent. There may be a situation where there might be

gap areas or a very small number of qualifications exist against a standard. If the providers do not attract sufficient student numbers and a programme is not economically viable, they may choose to discontinue it. In such instances, other considerations may be required, for instance, funding and supporting any niche programmes that might have been developed in response to a gap area and while the student numbers remain low in the early stages of delivery of such programmes.

Consideration should also be given to other circumstances where transfer of copyright be appropriate, for instance, if a Foundation Degree in a highly specialised occupation area is delivered at only one provider which becomes insolvent- in such cases, there should be clarity in the whether the awarding body holds the responsibility to find an alternative teaching partner or whether IfATE will identify alternative approaches to maintain continuity of the qualification.

**Q4. As Awarding Organisations and Higher Education providers, how important are the following as incentives to encourage the submission of your qualifications for Institute approval?**

A) A clear mark of labour market relevance

4A) We agree that a clear mark of labour market relevance will incentivise awarding bodies to submit qualifications for Institute approval. However, the process that underpins this relevance will be crucial. It is important that there is confidence in the constitution of employer panels, and these need to include voice of SMEs and not led by a limited number of influential employers. The process to maintain the labour market currency of these qualifications will be fundamental so that employer engagement is not a one-off requirement.

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

4B) Further details are required on the competitiveness of the funding package to answer this question more meaningfully. In general terms, as recommended by the post-18 review panel, it will be considered by the spending review that HTQs are entitled to the same tuition fee support and teaching grant, and equivalent maintenance loan as level 6 qualifications. While this is a step in the right direction, it is important to note that the comprehensive review of level 4/5 provision includes what was formerly referred to as prescribed as well as non-prescribed HE qualifications. NPHE is relatively lower cost and approval of HTQs is likely to (and it should) bring some NPHE qualifications in the HTQ category. This raises questions about the necessary changes required to bring such NPHE qualifications in scope for public funding. Consideration needs to be given as to how funding for NPHE could change, for instance, if say AAT level 4 becomes an HTQ, what will this mean for the fee/finance, and considering that price is an indicator of quality, will there be an expectation HTQs aligned to a particular standard charge similar or comparable fees.

Also, the ability to charge higher fee does not on its own mean that the qualifications can be priced at the same level as undergraduate Degrees. In 2016/17, 75 colleges (of the circa 200 colleges that delivered HE) had access agreements in place and even these 75 colleges only charged higher fee for a limited range of high cost programmes. Teaching grants for HTQs will be supportive and maintenance support for both full-time and part-time programmes will help overcome the funding disparities.

The post-18 panel recommended that non-approved level 4/5 qualifications should attract lower funding than HTQs and non-approved qualifications could have a lower fee cap than for approved qualifications

and these may not be eligible for teaching grant. These decisions need to be considered carefully because this could mean that universities will not be able to charge higher fee for say a Foundation Degree in English and close these courses and deliver full degrees only. This could mean that level 4/5 qualifications in non-HTQ subjects may decline and a full Bachelors degree may be the only route, thereby increasing the uptake of level 6 which may be an unintended consequence for non-HTQs.

We are also concerned whether there may be an unintended consequence that rather than studying approved programmes that could command higher fees, students from less privileged backgrounds may choose to study lower cost non-approved programmes. This could also apply to adult learners who tend to study on a part time basis and are sensitive to debt. We recommend that higher costs of HTQs are subsidised through grants rather than higher tuition fees for these programmes.

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

4C) Impartial, timely and appropriate IAG will be crucial to the potential success of HTQs. It is perhaps the most challenging aspect of the reforms to raise awareness and build confidence in level 4/5 qualifications and encourage students to see this as a genuine alternative to Bachelors degrees. Acceptance and recognition of HTQs will take a long period of time and rather than changing policies too quickly, concerted efforts should be placed in making the policies work.

As noted previously, not all level 4/5 qualifications are technical in nature so they will not qualify to become HTQs. The key here will be how students and employers distinguish between say a Foundation Degree that is kitemarked vs another that is not.

There is a proposal to identify the qualifications approved by the Institute with a single name or kitemark. The selection of this name or kitemark will be critical in signalling HTQs and raising awareness particularly when this name or kitemark does not require a change in the actual title of the qualification. For instance, 'higher technical' is a characteristic and does not relate to the level of HE. Bachelors and Masters degrees can also be technical in nature and while levels 4 and 5 are often conflated, these are also two different levels in the qualification frameworks.

D) A swift and straightforward process for submission, appraisal and decision-making

4D) As stated previously.

E) Other (please specify)

4E) We feel that in addition to focusing on gaps in occupation areas, emphasis should be placed in identifying gaps geographically. It is important that the opportunities to study HTE are presented to students in cold spots and in parts of the country where choices for HE are limited. Several FE colleges in the country offer HE opportunities in rural areas and cold spots. Such colleges should be given additional grants to deliver HTQs to enable them to meet the local and regional higher technical skills needs.

It would also help to understand whether the apprenticeship levy could be used to fund HTQs, as it could help improve employer engagement with HTQs.

**Q5. Would you support incorporating the above flexibilities/requirements in the Institute approval process, and are**

**there any specific points you would like to raise in relation to the above?**

A5. We broadly support the principle of flexibility to include additional content which is not aligned to the occupational standards. This will help respond to local/regional skills needs. We feel there should be a limit on such additional content so a balance can be struck between the regional and national focuses. For instance, if more than 25 percent of the content was adapted locally, the qualification may not be able to deliver all the required KSBs for a standard.

We feel there should be an emphasis on a set of core transferable skills that employers value and that can help students prepare for careers that will stretch for 50 years and will demand change of roles and occupations.

We feel there is value in the Institute approval of smaller, more specialised awards that might cover some but not all of the knowledge, skills and behaviours in a relevant occupation so long as these awards can build towards a bigger award and allows for some banking of credits towards another HTQ at a higher level and towards a degree. It is also important that these smaller qualifications are funded appropriately so it does not impact on the loan entitlement for students.

Flexible learning and the prospects of stepping on and off the course for all students, especially for adults (who often have multiple commitments such as work or caring), is helpful provided it enables credit accumulation and transfer. Recognition of prior experiential learning is also helpful in this regard.

There is also a challenge for OfS regulatory principles (that are informed by metrics such as continuation rates) to sufficiently align with and

recognise these models whereby students can step on and off their courses. There should be a clear recognition that students can complete a lower award and may not straightaway progress to a higher award. For example, many students who study a HNC at a college often do not immediately progress to a HND, they enter the labour market and come back to the college for completing their HND after a year or two. Students who exit their courses to pursue employment should not reflect poorly on the provider metrics.

We also feel that it would be beneficial for the Institute to require proficiency in employability skills and digital skills, as part of HTQs. We feel entrepreneurship should also be embedded in HTQs to equip those looking for self-employment and business start-ups.

It is important that qualifications are not designed with an aim to meet the minimum standards to obtain an approval from the Institute. This will disincentivise awarding bodies in working towards a stronger and more rounded content and lead to a 'race to the bottom'.

While an alignment with professional body standards (where relevant) can be constructive, we feel this requires further consideration. Some established qualifications that are already accredited by professional bodies and are delivered on a full-cost basis, will have little incentive to seek IfATE approval.

As for Maths and English, these requirements may vary from one standard to another. We feel these skills should be developed as the student progresses on their HTQs but these should not be pre-requisites for entry to the programmes. If students can attend a university without English and Maths requirements, easier entry to degree courses will encourage students to choose to study a degree rather than an HTQ.

Requirements for periods of work-based learning should also be carefully assessed. These should be included or not based on the occupational requirements and assessment undertaken by the employer panels. At a broad level, we feel period of work-based learning can make the delivery more complex and demanding, considering this is sought as part of T-levels already.

**Q6. Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements?**

A6. We broadly agree that Ofqual's and OfS's regulatory arrangements should be retained.

There is an indication in the consultation that ALL funding will not be applicable to approved HTQs. We agree that following the close of the consultation, the impact of proposals set out in the consultation on ALL funded provision is considered carefully.

Also, we feel clarity is required on the quality assessment of HTQs that might be currently funded and regulated by ESFA and Ofsted. We understand HERA 2017 stipulates that all level 4 and above provision is under the regulatory scope of OfS. However, how OfS will regulate NPHE, is not yet clear. It is also important that DfE or IfATE clarify whether NPHE qualifications that become HTQ will be regulated by OfS in the same way as other non-HTQ NPHE qualifications.

**Q7. Are the suggested criteria suitable markers of high-quality technical provision?**

A7. We agree that the criteria are markers of high-quality technical provision however we feel this should be the criteria should not be

applied to HTQs only. This criteria could apply to HTQs, HTE or non-HTQs, technical degree courses and others.

We feel the proposed quality assessment and management with the involvement of several agencies can make the HTQ approval and ongoing fulfilment of conditions a complicated process for providers. Tasking OfS to develop an additional set of ongoing registration conditions is highly likely to disincentivise colleges to deliver HTQs.

There is a reference in the consultation that the government wants high quality providers regulated by the OfS to be able to demonstrate the quality of their technical provision (page 22). Further clarity is required in whether this could mean that providers that are not on the OfS register will not be able to deliver HTQs.

It appears that as delivering institutions, the additional set of ongoing conditions will apply to colleges rather than their validating universities. This point requires clarification particularly because all colleges that deliver HE are not registered with the OfS. Colleges that deliver HE on a franchise basis only (and meet certain additional criteria) have access to student finance without necessarily registering with the OfS. It is therefore important that if any additional technical conditions were to apply, colleges delivering HE on a franchise basis should continue to exercise this option and that they are able to deliver HTQs without having to register with the OfS.

**Q8. 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?**

A8. We disagree that additional conditions of registration should be required to indicate high quality of the HTE provision. We do not feel the requirements should be stricter for HTE than for undergraduate degrees or other level 4/5 provision. We believe that the OfS baseline should apply to HTE as well as other HE. It is also worth noting that OfS regulatory approach is outcomes based and does not focus on the process so we feel there should be parity in applying these principles to all HE.

We believe that in general terms, as the key providers of level 4/5 technical and professional education, colleges already meet most of the additional criteria stated in the consultation. Colleges have strong links with employers and aim to attract teachers with relevant industry experience. However, owing to funding constraints and the terms and conditions of teaching in FE combined with less attractive salaries, it is challenging for colleges to recruit teachers with industry specific experience. Likewise, colleges require considerable investment in facilities and equipment to offer competitive and up to date learning environments. The criteria are relevant however it will be challenging for colleges to meet these unless additional funding is provided to colleges to deliver HTQs.

The proposal also makes reference to the rigorous assessment process for IoTs and that the core delivery partners within IoTs will be deemed to have met the separate OfS technical conditions. It is important that the criteria and assessment for IoT and that for HTQs is not conflated and the two sets of requirements are stated clearly. While it is logical to expect those that meet the IoT criteria should meet OfS registration conditions, there is some evidence to suggest that delivery partners deemed successful for IoTs may not necessarily meet the OfS registration conditions.

**Q9. 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?**

A9. We strongly agree that grant or capital funding should be provided for HTQs and additional funding will lead to better quality, however, we disagree that the criteria for high-quality provision should be a set of additional technical ongoing OfS registration conditions.

We also feel that colleges should be provided additional funding before they are assessed towards meeting any additional proposed criteria such as learning facilities, expertise of teaching staff etc.

9A) More funding for HTQs can be used to invest in fostering stronger links with employers. Employer engagement is a resource intensive exercise and we feel this will enable providers to develop a better understanding of the labour markets locally and regionally.

B) What specifically would additional funding support?

9B) Additional funding can help providers to invest in facilities and learning resources, strengthen employer links, raise awareness of HTQs through more targeted IAG for learners and raising awareness and profile of HTQs amongst employers and parents. Better funding can help attract and retain teaching staff that have industry specific knowledge and expertise. Funds can also be used towards providing secondment opportunities for staff which helps maintain currency of staff skills and expertise and which also helps in attracting and retaining teaching staff.

This can help in investments in blended learning and in building infrastructure for credit accumulation and transfer and recognition of prior experiential learning.

C) Would additional costs be a barrier to delivering high-quality HTQs? Why?

9C) Additional costs can be a barrier if additional funding is not provided to support the delivery of HTQs. High cost programmes need additional funding to ensure courses are financially viable.

D) Which would be a greater priority for providers: 'capital' or 'recurrent grant' funding? Why?

9D) We believe think they are both important but recurrent grant would be a greater priority after an initial investment is made in HTE delivery at colleges.

**Q10. 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? Why?**

A10. We agree that the government 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. However, we feel a competitive student finance package should also be made available based on other criteria.

For instance, the options of part time mature students are strongly shaped by the location of study. Part time and mature students may be further disadvantaged if their local provider does not meet the HTQ conditions because such students may not be consider studying elsewhere.

It is important to understand the impact of funding on provider behaviour as well as that of awarding organisations. It is also crucial to understand any potential unintended consequences of the overall changes in fees and finance for HTQs. As stated previously, it is important that choices of students from disadvantaged students are not driven by lower costs of non-approved qualifications.

We are also concerned that if a college wishes to deliver a HTQ and their current validating partner does not submit their qualification to IfATE, the college will need to find an alternative validating partner, and this is often not a straightforward process. It will be helpful if the Institute builds and maintains a register of providers who do not have DAPs but are interested in delivering HTQs aligned to specific standards, so it can help match awarding bodies with potential teaching partners, where required.

**Q11. 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?**

A11. We strongly agree that additional non-financial support is needed by colleges to develop their workforce and to engage fully with employers. Colleges often have staff teaching on mixed teaching contracts and can build on the knowledge and expertise of those

teaching on T-levels/other level 3 to teach on level 4 and 5 programmes. Employers can also provide non-financial support by providing access to equipment and facilities that are expensive.

FE has been considerably under-funded for decades and we feel that it is not sufficient to channel efforts in raising the profile of HTQs, it is also important to raise esteem of where these qualifications are largely delivered. Colleges have been at the forefront of delivering level 4/5 education and are well placed to deliver HTQs. A combination of financial as well as non-financial support will help raise the profile of HTQs. The profile of FE will be raised, in the main part, through better funding for FECs. However, raising awareness of HTQs amongst employers, particularly with SMEs will help boost employer engagement with colleges, which in turn will help improve the uptake of these qualifications by students.

The phased approach to T-levels will help provide pathways for younger learners and they will have opportunities for progressing to HTQs. While we feel there should be a joined-up approach to the implementation of T-levels and HTQs, we also believe that we should not lose sight of mature students who will not have studied T-levels.

## **Q12. 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;

12A) As stated above, colleges have been considerably under-funded and need financial support. That said, colleges have a track record of delivering higher technical college (without necessarily labelling it as such) and as providers of level 2/3 to levels 4/5/6, colleges are able to

share resources such as learning spaces and facilities, teachers teaching on levels 3 and 4/5, and draw on employer links to offer them solutions to their business needs rather than explicitly focusing on 'selling provision'. We feel with additional funding, colleges will be able to further strengthen and co-ordinate these processes and activities that colleges offer already.

Colleges that are delivering T-levels will logically be thinking about the progression opportunities for their students to study HTQs. As providers of both T-levels and HTQs, colleges can offer internal progression opportunities for students from FE to HE, which has historically placed colleges uniquely as dual-sector providers.

B) Where additional help may be needed; and

12B) We would re-iterate the pressing call for additional funding to help raise awareness of these qualifications, invest in facilities and equipment, recruit and retain expert teaching staff made elsewhere in this response.

We also feel it would help to have a clear, consistent and sustained campaign from the government to promote these qualifications. Messaging from the Prime Minister and Senior Ministers can help make a difference, particularly when promoting these qualifications to employers, learners and parents. This can also help address issues relating to the image and perceptions of FE as 'second tier' and help promote teaching in FE as a fulfilling career.

C) What providers think should be prioritised in terms of any future funding allocation. If you have any further comments that are not covered in the above, please include here.

12C) As stated previously.

**Q13. To what extent do you agree that there is a need and opportunity for more young people and adults (including those who need to upskill/retrain) to be undertaking HTE in the future? Please provide examples from your own experience.**

A13. We strongly agree that there is a need and opportunity for younger as well as older students to study HTE in the future. Only 50 percent of young people are estimated to participate in HE by age 30, we believe HTE can present opportunities for young people to study HE. Colleges are the key providers of level 4/5 education and the majority of college HE is at a sub-Bachelor level. College HE is characterised by its employer facing offer and for providing opportunities to students who would otherwise not consider studying HE. Colleges help improve life chances of students by offering them the opportunity to study HE in local settings where they feel supported.

Research suggests that students studying level 4/5 at HE tend to do so largely for instrumental reasons and many choose to study HE at a college because of the familiar and less intimidating settings that colleges offer. High profile HTE courses that are closely aligned to the labour market needs and deliver positive employment outcomes will be valued by both young as well as older students who study HE at FE colleges.

On the other hand, employers voice concerns about under-preparedness of degree graduates for employment and poor labour market outcomes lead to less fulfilling outcomes for degree graduates. While we agree labour market outcomes are one of the many indicators of graduate success, we feel HTQs can present an attractive alternative to degrees for students if they are able to make timely and informed choices that are most suitable for them.

It is important to ensure that HTQs enable students to enter into the labour market as well as provide opportunities for progression to level 6 so future options for students are not constrained. Presently, many providers award level 4/5 qualifications as exit awards if those registered for undergraduate degrees are not successful in completing degrees. For instance, universities and colleges offer CertHE or DipHE certificates if a student exits after completing the equivalent of year 1 or year 2 of a degree (taught on a full-time basis). It is important that HTQs are not viewed as a 'consolation prize' but a valued award in its own right. An effective IAG will be crucial to position HTQs as a route of choice and prestige. We also feel that non-technical level 4/5 courses such as those in Arts and the Creative sector should be recognised and valued in their own right.

#### **Q14. To what extent do you agree with these measures to improve the profile of HTE?**

A14. As stated earlier, the naming and branding of HTQs will be a crucial part of the reforms. The proposals mean that the actual title of the qualification will not change but the Institute approved HTQs will be kitemarked. This will present challenges in how key stakeholders such as learners and employers will distinguish between approved vs non-approved level 4/5 qualifications.

We agree that professional bodies accreditation helps enhance the status and position of qualifications, however, as stated before, if a professional body already accredits a qualification, and the provision is full-cost, it is unlikely that the HTQ status would add any immediate benefits. There is evidence to suggest that professional body accredited qualifications, many of which are in the NPHE space, are already valued

by employers. For such qualifications, HTQ branding is unlikely to bring any added value to the imagery, although better funding would.

Clear and sustained communication to promote HTE will be a crucial part of the reforms. Level 4/5 is not understood by students, parents or their employers and hierarchies simply reinforce the belief that level 6 is superior than level 4/5 and level 6 best meets the needs of learners as well as employers. A targeted and sustained campaign to promote HTE will be crucial in developing an understanding of HTE and raising the profile of HTQs.

**Q15. To what extent do you agree with these measures to improve IAG for young people, adults and employers? Please give further thoughts on other ways we could help fill the HTE information gap for:**

- **Young people and their teachers considering their options after completing a level 3**
- **Adults in the workplace who need to upskill/retrain**
- **Employers who have skills shortages at higher technical level**

A15. We agree with the measures suggested in the proposal.

Schools and teachers play a critical role in influencing student choices; therefore, we agree that working with this group is essential in increasing the uptake of level 4/5 qualifications and HTQs more specifically. The consultation does not refer to parental influence of student decision making. We feel IAG efforts should recognise and target parents as a vital group.

There needs to be a joined-up approach when working with teachers and employers for T-levels and HTQs. There is a work underway to raise

the awareness of T-levels amongst employers and IAG for HTQs should build on this work. More work could be done with social media, you tube etc channels through which young people communicate.

Adults in the workplace are hard to reach however adults not on the workplace are even harder. Employers and peer groups are often the source of information and advice for adults in the workplace. Local colleges and national campaigns can help reach adults both in the workplace and as well as those who may not employed.

Employers often engage with providers whom they trust in providing advice and support on workforce development and help meet their educational and training needs. Engagement with SMEs is more challenging and more needs to be done to explain the value to their business of a highly qualified workforce. Communication campaigns need to be targeted at business representative bodies to maximise the reach to businesses. As outlined in the consultation, LEPs, Chambers of Commerce and professional bodies can also play an important role in raising awareness of HTE.

We also feel that the recruitment processes need to adapt to improve the acceptance of HTQs. Many employers seek graduates to fill positions that do not require individuals qualified to a degree level. Although it will take some time before the kitemark is understood by the employers, we feel if roles that are advertised by businesses include HTQs as a required qualification, it will help raise the profile of HTQs, and HTE more broadly.

**Q16. 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 an HTQ?**

A16. We agree with the suggested approaches in the consultation to help increase the uptake of HTE and in supporting students.

**Q17. 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.**

A17. No comments.