# IfATE consultation on the approval of level 3 technical qualifications

# Response of the Association of School and College Leaders

## A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million children and young people across primary, secondary, post-16 and specialist education. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

2. ASCL welcomes the opportunity to contribute to this consultation.

## B. Key points

3. The fact that this is an open consultation on regulatory approaches to alternative qualifications at level 3, which runs parallel to an alternative technical qualifications consultation being run by Ofqual, reflects the importance of achieving fairness and consistency in the approaches used by different awarding bodies. In this sense, we welcome the consultation. However, the changes proposed may impact negatively on both providers and students, especially given the cost-of-living crisis and the increase in costs likely to occur when awarding bodies implement these changes. We urge Ofqual and IfATE to consider the cost impact of these changes on providers and fee-paying students and to push for ways to mitigate these extra costs.

4. Assessment must be fair and manageable to both the centre offering the qualification and assessment and to the student taking the assessment. Whilst we understand the importance of keeping the employer at the core of the technical qualifications system, it is important that we don't lose sight of providers and students who keep the system going.

5. We are concerned that employers and learners face considerable barriers in utilising technical qualifications. The National Audit Committee (NAO) report 'Developing workforce skills for a strong economy' (July 2022) said that there should be further thought given to how barriers to skills training can be addressed, and to issues around reskilling or upskilling older workers who form a growing part of the UK workforce. Reliance on employers having the capacity and willingness to be involved in developing local plans creates problems when it is unclear what assurance is in place for employer involvement.

6. There is evidence from the NAO that employers' spending on training from 2011 to 2019 fell by 11%, while the number of adults in government-funded education or skills training fell by nearly half between 2010/11 and 2020/21 – down from 3.2 million to 1.6 million.

The decline was seen particularly in disadvantaged areas, with a drop of 39 per cent from 2015/16 to 2020/21 – equating to 280,100 people.

7. Employers and providers struggle to navigate the growing skills programmes led by different government departments. The DfE's reforms in the Skills and Post-16 Education Act 2022 range from lifelong loan entitlement; ambitions for strengthened links between employers and further education providers; and proposals to recruit more teaching staff, create LSIPs to respond to local labour market needs in key skills, and reform levels 4 and 5 technical education. Technical qualifications are vital to workforce development, but the myriad of initiatives is confusing for both employers and potential learners, and there is little evidence that any of this is closing the gap for the most disadvantaged in society.

8. Against this background, we are concerned about yet more change to level 3 technical qualifications focussed on the needs of employers, without the same attention being given to the impact on providers and students.

## C.  Answers to specific questions

**Question 4: What current barriers do employers face when looking to utilise technical qualifications for workforce development and/or recruitment?**
The number of initiatives led by different government departments creates a complicated landscape.

9. The paucity of funding for programmes for young people and adults in education means that providers sometimes struggle to offer the full breadth of provision to a viable group, and they are often unable to attract people from industry to teach on those programmes.

10. Employers, especially SMEs, need more information on the content of technical qualifications and what skills they demonstrate before contributing to the regulation which surrounds those qualifications.

11. The incentives for both employers and learners to engage in technical education and development need to be improved, as stated in the NAO report referenced above.

**Question 5: We plan to provide guidance to awarding bodies to help them with the shaping of their development priorities/approaches. This guidance would be developed by employers. Do you agree that this would be helpful?**

12. Yes, we agree that employers should be a key part of the process of shaping priorities, but it must not be forgotten that it is students who achieve the awards. There must be some assurance about the quality of employer involvement and providers, and student voices need to be included in shaping approaches.

**Question 6:  What information would it be most useful to include within our strategic guidance to inform the development priorities/approaches of awarding bodies?**

13.With technical qualifications, the needs of employers (large and small), students and providers are all key priorities. It is also important to understand the context in which the skills to be assessed are being demonstrated, and what level of understanding of those skills will be achieved, as well as what will be assessed.

**Question 7: Are you clear as to where different types of qualifications will fit within the categories described?**

14. Somewhat clear. The categories to be used are clear, as are the different types of qualifications, but the way the qualifications are arranged to fit categories does not necessarily match with how providers organise their curriculum. The nature and content of the tests to be used, particularly in terms of alternative outcomes and significant outcomes, are also not entirely clear.

**Question 8: We have set out our proposed approach for pre-defining additional specialist areas and cross-cutting functional areas against which awarding bodies can submit qualifications. Do you foresee any issues with this approach?**

15. No. The examples given for pre-defined additional specialist areas are clear.

**Question 9:  Do you see a need for IfATE to introduce an exceptions process to allow awarding bodies to submit proposals for developments in the additional specialist and crosscutting functional areas?**

16. Yes. There are often exceptions in relation to specialist occupational areas and it is important that these exceptions, where they exist, can be recognised by awarding bodies.

**Question 10: Do you agree that the evidence requested is sufficient to assure IfATE of employer demand for submitted qualifications?**

17. No. Employer demand can shift from year to year. Large employers' demands are usually very different to SME's demands.  Large amounts of location-based detail is needed to ensure employer demand for all types of employer is clear. It is not clear how the employer demand test will be employed by IfATE; how it will differentiate between types and size of employers or how accurate the test will be if it is changed from year-to-year as demand changes.

**Question 11: Do you have access to any additional data / evidence which you feel IfATE should consider when assessing the employer demand for submitted qualifications?**

18. No, but we feel that the NAO data mentioned above should be considered.

**Question 12: Is the proposed process clear for submissions into the employer proposed category?**

19. Yes, in that the options proposed are clearly set out, However, different qualifications' contents need to change over time, and the process for acknowledging this is not clear.

**Question 13: Are you clear as to our proposed criteria for testing content aligned to KSBs within occupational standards which are published by IfATE?**

20. Somewhat clear. It is not entirely clear how content which is not aligned to KSBs will be judged. It is also unclear how responsive the criteria are or how flexible the timescale for alignment will be.

**Question 14: Are you clear as to our proposed criteria for testing content aligned to pre-defined duties which are published by IfATE?**

21. Somewhat clear. See also our answer to question 14 above. It is unclear how responsive the criteria are or will be, or how flexible the timescale for alignment will be.

**Question 15: Are you clear as to our proposed criteria for testing content which does not align to any outcomes which are published by IfATE?**

22.Somewhat clear. It is not clear how awarding body responses to these criteria will be validated.

**Question 16: Are the assessment design flexibilities allowed helpful to ensure differences between occupations can be reflected within assessments?**

23.No. The assessment design flexibilities are helpful but it is unclear how flexible the designs will be for students with SEND, who may gain from more use of internal assessment or a variety of assessment methods in any occupational sector.

**Question 17: Is the guidance provided around assessment design sufficiently clear to facilitate the development of high-quality assessments?**

24.No. The guidance is clear, but it is not clear how high-quality assessments will be assured.

**Question 18: Do you agree with IfATE's proposed requirements relating to the accurate description of content in qualification titles?**

25.Yes. The requirement relating to description of content in qualification titles seems appropriate and clear. They must be consistent across awarding bodies.

**Question 19: Would it be helpful to employers if the title of a qualification included confirmation of employer endorsement following approval by IfATE?**

26.No. This would make for long and potentially clumsily worded titles. However, confirmation of employer endorsement could be included on the certificate awarded or in some other communication to the student.

**Question 20: Do you agree that the publication of KSB mapping in occupational entry qualification specifications is beneficial to employers and providers?**

27.Yes. Publication of KSB mapping to occupational entry qualification specifications would be beneficial to both employers and providers. It will provide helpful referencing.

**Question 21: If you are an awarding body, what EDI data do you currently collect for students who undertake your qualifications and would you be prepared, and able, to share it?**

28.N/A

**Question 22: If you are an awarding body, how do you plan to embed our sustainability and digital skills frameworks in qualifications**

29.N/A

**Question 23: With reference to the impact assessment published in Annex A, are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals?**

30.Yes. The consultation suggests a significant amount of change which we know will cost providers and those students who are self-funded. This is not helpful to either providers or students. Annex A identifies that providers may find the proposed changes require extra resource, both in terms of staff development and other resource demands. However, there may also be extra costs in terms of curriculum planning, management, and administration, which are not recognised in the annex. It is important to provide additional funding to providers for these extra costs as they are insufficiently funded already and may find it difficult to implement the proposed changes without additional resource.

**Question 24: With reference to the impact assessment published in Annex B, are there any other potential impacts (positive or negative) that have not been identified?**

31.Yes. We believe that disadvantaged and disabled learners may be impacted by the changes as so many of these rely on employer involvement which is not assured. We know from experience of T level placements that the workplace is not always conducive to those with specific needs or disadvantages. In addition, the reference to students taking a mix of technical and academic programmes, in the proposed guidance, does not reflect the fact that this is already possible within study programmes taken by students in both schools and colleges.

# D. Conclusion

32.ASCL believes that assessment must be fair and manageable both to the centre offering the qualification and assessment and to the student taking the assessment. Whilst we understand the importance of keeping the employer at the core of the technical qualifications system, employers vary significantly in size and scale of their need. The consultation does not appear to differentiate between types of employers.

33.It is also important when largely focussing on employers that we don't lose sight of providers and students who keep the system going.

34.We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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