

Consultation on the inclusion of higher technical qualifications in Office for Students' student outcome measures

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 25,000 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. Responses to specific questions

Question 1: Do you agree that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs?

3. Disagree.
4. We acknowledge that HTQs are different from other, academic, level 4-6 qualifications and therefore might be treated differently. We also acknowledge that the interests of students must be served. However, HTQs are not new qualifications. Further Education colleges are the lead providers of HTQs at levels 4 and 5; they have been offering these qualifications for many years and the numbers of learners on some HTQs are quite small. This is likely to lead to very small cohorts for analysis if the indicators are split.
5. If the OfS were to adopt the proposed approach, it would introduce up to nine additional split indicators for each provider. This could be a major administrative burden and result in a distorted view of quality in a provider.
6. Any provider with performance below the minimum numerical thresholds for their HTQ students may experience an increase in regulatory burden if they are selected for assessment on this basis. Providers could be assessed on a small number of courses and students, resulting in a distorted view of the quality of the overall organisation.
7. We understand that about 70 OfS-registered providers have approved HTQs, the majority of which are colleges. Colleges may already have data published for some of these split indicators, but the proposal from OfS would still require extra work as data

collection systems differ. We also note that providers with students on HTQs would need to consider additional data in relation to these courses.

8. We do not agree that such an increase in regulatory burden would be justified or that an approach which distorts the view of the quality of provision is appropriate.
9. In addition, HTQs are sometimes delivered as parts of apprenticeships but are not always regulated by OfS in the same way. This may lead to different views of the quality of HTQs depending on how they are delivered.
10. We appreciate that OfS would be acting to protect students in circumstances where courses may not meet the minimum expectations, but this should not, in our view, be done in such a way which leads to additional regulation, extra assessment of centres or extra administration resulting from the proposed approach to setting split indicators.

Question 2: If you do not agree, do you have a preference for the approach that the OfS should take to regulating outcomes for students studying on HTQs?

11. See answer to question 1 above. We believe that existing approaches to assessing providers with the existing indicators used by OfS could be adapted to include HTQs, including modules of HTQs. This would still safeguard students where providers do not meet the minimum standard, and is no different from approaches used by other inspection bodies.

C. Conclusion

12. We have sought responses from our members who offer HTQs, and our responses reflects the views of those who responded. We are concerned about any proposals which will increase additional regulatory and administrative burden on providers or distort views of their quality, when we know that OfS already takes a highly regulated approach.
13. 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 we can.

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