Government consultation on Higher Technical Education

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 19,000 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 young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary and further education phases. 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. The Principals Professional Council (PPC), which represented Principals, CEOs and Deputy Principals of further education colleges, joined forces with ASCL in 2014 and in 2019 was rebranded ASCL FE. ASCL FE operates as a committee within ASCL and now also represents other education system leaders in the further education and sixth form sector.

3. Many further education providers offer post-18 and higher level technical provision, including professional training courses and higher education. ASCL is therefore pleased to be able to respond to this consultation.

B. Key points

4. ASCL welcomes the government's review of classroom-based higher technical education level 4 and 5 qualifications. There are, in our view, three important aspects of this level of technical education – developing prestigious programmes which meet the skills and qualification employers want, higher quality programmes at this level delivered by further and higher education providers, and the fact that both younger people and adults in work should recognise the value of the programmes on offer.

5. ASCL recognises that the UK has fewer people trained to this level than many other countries worldwide and that only a quarter of people under the age of 21 have studied at this level. We also recognise the government's desire for greater take-up of technical qualifications at levels 4 and 5 to meet the needs of the economy and society.

C. Answers to specific questions

Question: To what extent do you agree or disagree with the proposed aims of HTQs set out in paragraph 9 of the consultation?

6. We largely agree with these proposals. Where we do not agree, our reasons are set out in our responses to the questions below. It is logical to align employer-led standards with apprenticeships, T levels and HTQs, the latter being important progression routes for T levels.

Question: 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?

7. We believe that, irrespective of whether this is voluntary or compulsory, most awarding bodies will want to ensure that their qualifications meet occupational standards. We therefore agree as this makes sense from a customer and market point of view.

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

8. ASCL believes that copyright and intellectual property are both important characteristics within professional and technical qualifications that should be maintained. We therefore agree with this proposal. Copyright should be applied for again on approval as the content of the newly approved qualification may differ from its predecessor.

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

9. There may be some professional or technical qualifications associated with small sectors where this is appropriate, but in general it is unlikely that copyright would transfer. We therefore agree with approach proposed, but suggest that awarding bodies are best placed to answer this question.

Question: 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
b. A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)
c. Enhanced support for potential students through information, advice and guidance (e.g. careers advice)
d. A swift and straightforward process for submission, appraisal and decision-making
e. Other (please specify)

10. We agree, from a provider point of view, with the list of incentives, for the following reasons:

11. Labour market relevance – it is as important for the customer/student in terms of transferability of the qualification that the qualification is approved as it is for the awarding body or provider. This will give the qualification greater credibility inside and outside the profession or technical field. The process of approval should not be overly bureaucratic.

12. A competitive funding package is crucial to help increase the numbers taking up professional and technical qualifications at this level.

13. Enhanced support for students – maintenance support and improved advice and guidance is important at this level. Most providers will know about and appreciate enhanced support for students, but this may not be the case for students transferring to another organisation offering professional and technical qualifications at level 4.

14. A swift and straightforward process for submission, approval and decision making – this is important as it is likely that delays caused by bureaucracy will impact adversely on the individuals and their providers and employers.

Question: 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?

15. We would support this proposal. We also raise the following points:

16. We agree that flexibilities such as those listed in the consultation should be incorporated into the approval process. The most important issue, however, is to avoid the process being too bureaucratic and slowing down approval of the qualification.

17. We agree that there should be flexibilities in relation to additional content, broader qualifications, flexible learning, maths and English, digital skills, transferable and employability skills, alignment with professional body standards and a period of work-related learning.

18. We also agree that it is sensible to retain the infrastructure already in place.

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

19. We agree that this is necessary, but are concerned about the additional costs often incurred by providers when, in particular, the OfS is involved. This can be counterproductive and add significantly to the registration costs of qualifications.

20. As in our answer to the question above, it is sensible to retain the infrastructure already in place.

Question: Are the suggested criteria suitable markers of high-quality technical provision?

21. We agree that these are appropriate. We would encourage the government to ensure that the requirements for the skills of teachers are not onerous, so that suitably experienced technicians and professionals can be employed without major restrictions. For some qualifications at this level, it is the technical skills of the teacher that are most important, and their academic qualifications are of secondary importance to the programme.

22. ASCL also agrees that, over time, performance is important to learner progression into technical positions in the workplace.

Question: 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?

23. Please see our answers to previous questions.

24. We agree that technical qualifications should be registered. However, care must be taken to ensure that this does not become an overly bureaucratic or costly process which prevents providers employing experienced technical teachers (see also our concluding remarks about funding level 4 and 5 programmes appropriately).

25. Good or better providers should be financially supported and encouraged to develop new qualifications and their teaching workforce.

Question: 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?
a. How might this work to ensure provision best meets local skills needs?
b. What specifically would additional funding support?
c. Would additional costs be a barrier to delivering high-quality HTQs? Why?
d. Which would be a greater priority for providers: 'capital' or 'recurrent grant' funding? Why?

26. We agree that it is helpful, in terms of the set-up of a new qualification or provision, to link grant or capital funding to meet the ongoing technical qualification.

27. This funding has been helpful in terms of the Institute of Technology, but we do not feel this should be the only method of allocating grant funding or capital. Qualifications, particularly in engineering, are very expensive to deliver and have considerable ongoing capital expenditure needs. Additional ongoing costs in some subjects with high capital equipment costs could be a barrier to delivery of high quality if not addressed as an ongoing matter.

28. The funding system will also need to prioritise areas where industry has particular skills needs that cannot easily be met without greater support.

Question: 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?

29. ASCL agrees that providers should be able to offer their students competitive finance packages, as is the case for degree courses. However, this question suggests that approval will largely be compulsory. Non-approval could cause problems for some small awarding bodies and providers. This kind of differentiation is not something that ASCL would support. Collaboration and partnership between providers would help meet local and national skills needs.

Question: 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?

30. ASCL agrees that non-financial support will be needed, but these types of activity, such as training or development, would still have costs. This includes subject networks for teacher support, relationships with providers, and improved information, advice and guidance.

31. Other forms of non-financial support could also include wider workforce development, industrial updating, national marketing campaigns, the development of teaching and learning technologies, and management development.

Question: 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; and
c. What providers think should be prioritised in terms of any future funding allocation.

32. ASCL believes that providers could best allocate their resources in individual organisations and within local clusters of organisations so that a range of qualifications are available locally. The focus on future funding should be on the improvement of funding rates, student funding support and capital funding. Without additional funding support, there will be barriers to providers delivering sustainable high quality HTQ provision.

Question: 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.

33. We believe that level 4 and 5 technical and professional qualifications have a great deal to offer young people and adults, as well as upskilling the nation as a whole. These qualifications need to be more available locally to young people and adults to enable them to become more highly skilled in their chosen fields.

34. Improved revenue funding is needed to deliver high quality HTQs that meet both student and employer demands.

Question: To what extent do you agree with the proposed measures to improve the profile of HTE?

35. ASCL agrees with the measures proposed. However, as stated earlier, these measures must not lead to increases in bureaucracy or costs to providers or students. The qualifications should be appropriately funded and their profile raised.

Question: To what extent do you agree with the proposed measures to improve IAG for young people, adults and employers?

36. We agree with the proposed measures.

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

37. We agree that the information gap should be improved. Not all young people or adults can, or want to, study for a full-time degree, but they can and should be able to take professional and technical qualifications at level 4 on a full- or part-time basis.

38. More information is needed about HTQ courses and the skills these qualifications lead to as well as the skills required by employers. This is the case for young people, adults, teachers and employers. Information about the HTQs and their outcomes should be available more widely to all.

Question: 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?

39. A recent study by the NOCN and City and Guilds ('Close the Gap', September 2019) argues that the UK is likely to have a skills gap at levels 4 and 5 within the next five years, and suggests an 'upskilling levy'.

40. The lack of sufficient take-up of qualifications at levels 4 and 5 is largely because of insufficient information and knowledge about these qualifications outside of awarding bodies and providers. Providers of higher technical qualifications offer a wide range of programmes at levels 4 and 5, including professional qualifications, HNC/HNDs, foundation courses and foundation degrees, yet both providers and learners find

disparities in funding and finance support at this level, as well as a lack of knowledge about what is available.

41. ASCL believes, therefore, that unless funding, student finance and IAG about programmes at levels 4 and 5 are reviewed and improved, fewer people than is hoped will know about and be able to afford to progress to higher technical qualifications at this level. This will exacerbate the skills gap identified by the NOCN and City and Guilds report mentioned above.

42. We welcome the government's focus on this level of programme, which we believe is vital to the development of the nation's future skills. We believe that improved funding of providers and financial support for learners, along with improved IAG, will enable more higher technical qualifications to be known about and afforded by learners.

D. Conclusion

43. This is the right time to review funding for Higher Technical Education at levels 4 and 5. We welcome the government's focus on Higher Technical Education and the recognition that much of what is already offered at this level is of good or outstanding quality.

44. The issue of funding cannot be ignored when providers are making decisions about their offer. Providers need both sufficient funding and a rolling three-year funding settlement. This will support sustainability and ensure that providers are able to invest in the staffing, facilities and equipment to deliver more expensive courses. Providers must be confident that they will be able to cover the total cost of ownership of such programmes and the resources needed to ensure their high quality.

45. 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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Association of School and College Leaders
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