



Department  
for Education

# **Higher technical education consultation - analysis**

**Research report**

**July 2020**

**Authors: Philip Wilson, Kate Crosswaite,  
Liz Murphy and Sophie Elliott  
York Consulting LLP**

# Contents

List of figures	4
List of tables	5
Glossary	6
Executive summary	8
Introduction	8
Analysis approach	8
Key findings	9
Delivery of HTE	10
Student and employer demand	10
Wider impact	11
1. Introduction	12
Aims of the analysis	14
2. Methodology	15
Data preparation, coding and analysis	15
Analysis of email responses	16
Analysis of consultation data: challenges	17
Report Structure	17
3. Results	19
A: Respondent characteristics	19
B: Higher technical qualifications (HTQ)	21
C: Delivery of higher technical education (HTE)	61
D: Student and employer demand	101
E: Wider impact	129
4. Conclusions	136
HTQs	136
Delivery of HTE	137
Student and employer demand	137
Wider impact	138
Appendix One: Word counts	139

Appendix Two: Review of each code by references	140
Appendix Three: HTQ email responses	151
HTQs	151
Delivery of HTE	151
Student and employer demand	152
Wider impacts	153
Appendix Four: HTE consultation events analysis	154
HTQs	154
Delivery of HTE	156
Student and employer demand	158
Appendix Five: HTE consultation questionnaire	160
Appendix Six: Quantitative tables	173

## List of figures

Figure 1: Methodological approach.....	15
Figure 2: Question 7. (n=128 responses) .....	23
Figure 3: Question 9. (n=118 responses) .....	33
Figure 4: Question 11 summary.....	42
Figure 5: Question 11a. (n=122 responses) .....	43
Figure 6: Question 11b. (n=120 responses) .....	44
Figure 7: Question 11c. (n=120 responses).....	45
Figure 8: Question 11d. (n=121 responses) .....	46
Figure 9: Question 11e (i). (n=118 responses) .....	47
Figure 10: Question 11e (ii). (n=117 responses).....	48
Figure 11: Question 11e (iii). (n=118 responses).....	49
Figure 12: Question 11e (iv). (n=118 responses).....	50
Figure 13: Question 11e (v). (n=120 responses) .....	51
Figure 14: Question 11e (vi). (n=116 responses).....	52
Figure 15: Question 13. (n=121 responses) .....	63
Figure 16: Question 14. (n=120 responses) .....	69
Figure 17: Question 15. (n=82 responses) .....	73
Figure 18: Question 20. (n=119 responses) .....	85
Figure 19: Question 22. (n=112 responses) .....	97
Figure 20: Question 23. (n=125 responses) .....	102
Figure 21: Question 24. (n=121 responses) .....	109
Figure 22: Question 25. (n=120 responses) .....	113

## List of tables

Table 1: Key barriers and challenges of the data	18
Table 2: Responses from all sources	19
Table 3: Organisation sub-type	20
Table 4: Question 10	36

## Glossary

AI	Artificial Intelligence
AB	Awarding Body
ASD	Autism Spectrum Disorder
AY	Academic Year
BAME	Black and Minority Ethnic
CBI	Confederation of British Industry
CEC	Careers & Enterprise Company
CPD	Continuous Professional Development
DfE	Department for Education
DSA	Disabled Students' Allowances
DWP	Department for Work and Pensions
EHC plan	Education, Health and Care plan
ESF	European Social Fund
ESFA	Education and Skills Funding Agency
ESL	English as a Second Language
ETF	Education and Training Foundation
FAQ	Frequently Asked Questions
FDAP	Foundation Degree Awarding Powers
FE	Further Education
FHEQ	Framework for Higher Education Qualifications
GCSE	General Certificate of Secondary Education
HE	Higher Education
HEP	Higher Education Provider
HESA	Higher Education Statistics Authority
HR	Human Resources

HTE	Higher Technical Education
HTQ	Higher Technical Qualification
IAG	Information Advice and Guidance
IoT	Institute of Technology
IT	Information Technology
LEP	Local Enterprise Partnership
NHS	National Health Service
OfS	Office for Students
PEIs	Professional Engineering Institution
PSRB	Professional, Statutory and Regulatory Bodies
QAA	Quality Assurance Agency for Higher Education
SME	Small and Medium-sized Enterprise
STEM	Science, Technology, Engineering and Maths
TDAP	Taught Degree Awarding Powers
The Institute	Institute for Apprenticeships and Technical Education
UCAS	Universities and Colleges Admissions Service

# Executive summary

## Introduction

1. This report summarises York Consulting's findings following its independent analysis of the responses to the Department for Education (DfE) consultation on higher technical education (HTE).
2. DfE launched the consultation on the 8<sup>th</sup> July 2019, which was aimed at anyone with an interest in technical education and training for young people and adults in England. The consultation was online with an option to submit responses via email. It was open for 12 weeks (responses submitted by 29<sup>th</sup> September 2019).
3. The consultation had 28 questions and included closed (quantitative) questions and open text (qualitative) questions. The questions were ordered under five headings as follows:
  - Introduction: contact and organisation information.
  - Higher technical qualifications (HTQs): agreement with the proposed aims of HTQs, feedback on the proposals, incentives, approval processes, and the Ofqual and OfS regulatory arrangements.
  - Delivery of higher technical education (HTE): quality criteria, OfS technical registration, funding proposals, skill needs, resources and costs.
  - Student and employer demand: demand among adults, young people and employers, the profile and prestige of HTQs, the provision of career information and guidance, and feedback on flexible provision.
  - Wider impact: feedback on the HTQ proposals and individuals with protected characteristics, and other comments.
4. Consultation events led by the DfE were held in five locations in England in September 2019. These events focused on specific consultation questions and/or areas selected from the four main headings.

## Analysis approach

5. The analysis approach involved the following key steps:
  - Preparing a draft coding framework for each of the 22 open questions.
  - Identifying coding themes using an initial set of 43 responses from the early responses to the online consultation.
  - Confirming with DfE that the draft coding framework met their expectations regarding the scope of anticipated responses.
  - Undertaking further review and revisions of the coding framework once the final set of online responses was made available.

- Uploading data sets to NVivo 12 Plus software for detailed qualitative data analysis.

6. All coded data was analysed for each theme to identify recurring issues, where there were multiple references, areas of consensus, and other feedback. Quotes from responses are used to illustrate themes and key points throughout. The themes were reviewed in line with sub-groups to identify any differences among respondent groups.

## Key findings

7. There were 155 responses to the consultation comprising 132 online responses and 23 email responses. The respondent group was made up of seven different sub-groups. The largest group was professional/business organisations, followed by higher education (HE) providers and further education (FE) providers.

## Higher technical qualifications (HTQs)

8. There was strong agreement with the proposed aims of HTQs as laid out in the consultation document and widespread support for the ambition that they provide a high-quality technical route for young people and adults and deliver much-needed skills for current and future labour markets.

9. Key to the success of HTQs was believed to be strong, well-functioning and long-term partnerships between industry and academia, and sustained government support in raising their profile and prestige amongst students and employers.

10. Respondents were seeking a well-defined, fair, transparent and efficient approval process. They wanted this to be in-line with existing systems and able to respond to the ever-changing needs of the market.

11. They wanted relevant stakeholders to be involved and consulted in the approval process from the start to ensure assessment frameworks are fit-for-purpose and consistent workable practices are embedded.

12. It was felt that panels and groups in the approvals process should not be limited to a small number of influential stakeholders. Instead they should have diverse, representative expertise, capturing a wide-range of industrial and pedagogical perspectives. This would enable them to recognise effective learning models, as well as industry best practice.

13. Where supported, mapping qualifications against occupational standards was thought to be valuable in ensuring consistent delivery and providing clear entry routes into skilled employment. However, it was felt that the design of standards needed to be carefully considered to avoid risking gaps in provision, narrowing skill sets and to ensure that the breadth of technical and creative sector demands are met. Clear, up-to-date and flexible standards and definitions were considered imperative to ensuring that provision not only meets

current local and national skill requirements, but that the skills required for the future labour market are considered.

## **Delivery of HTE**

14. In order to ensure engagement with the HTE reforms, stakeholders need to feel confident that regulatory processes will be streamlined, designed to avoid duplication and add value to what is considered an already highly regulated system. Respondents wanted the roles and responsibilities of the various bodies involved to be clarified, and they sought assurances that the proposed system would not prevent industry and academic partnerships from responding adequately to labour market dynamics.

15. There was a consensus that the outlined quality criteria were suitable markers of high-quality technical provision and, in many cases, they were considered fundamental. However, questions were raised about the practicalities of meeting the criteria and how they would be assessed in practice. Respondents questioned the value of focusing on inputs, rather than learning outcomes, and emphasised the need to measure the benefits of provision in providing clear and robust employment pathways. Additionally, notwithstanding the broad consensus on the proposed quality criteria, some argued that further research and evidence needs to be undertaken to understand what constitutes 'quality provision'.

16. It was strongly argued that investment in the infrastructure needed to create suitable learning environments and measures to recruit and retain staff were essential to meeting the quality criteria and removing barriers for engagement. Further, it was anticipated that government support would be required to help facilitate links between industry and academia in areas where networks have not yet been built.

17. Whilst it was stated that some quality provision already exists in this space, it was felt that a substantial amount of both capital and grant investment would be required to bring HTE to an appropriate, future-proofed standard, especially in certain geographical areas and sectors. Capital funding would be required for the upfront costs to ensure the acquisition of up-to-date facilities and equipment, while recurring grant funding was also required for long-term sustainability and to meet the ongoing costs associated with design, development and delivery of high-quality HTE.

## **Student and employer demand**

18. There were high levels of agreement with young people and adults undertaking HTE in the future and with the proposed measures to improve the profile of HTE and IAG.

19. Significant skills gaps across a range of sectors and industries were reported and it was felt that meeting this skills demand would require high-quality technical training for young people and for adults throughout their working lives.

20. HTE was thought to have a key role to play in promoting social mobility, particularly for those in low-skilled work and in jobs at risk of obsolescence (due to technological advances). For HTE to fulfil this role would, however, require sometimes entrenched perceptions that technical education is a second choice to academic university routes to be challenged.

21. Respondents highlighted the importance of investing in raising awareness of HTE. This could take the form of active promotion, campaigns and close collaborative working with professional bodies and employers. In addition, it was felt that investment and training were also essential in ensuring that careers IAG is of a high standard and can provide information on clear and coherent career pathways for a wide range of HTE learners.

22. It was argued that careers IAG for technical education should start at a younger age, be accessible to learners already in employment, and specifically target teachers and parents as important influencers. Provision of IAG should utilise multiple communication channels including social media, employer events and online learning options.

23. Employers and professional bodies were thought to have a key role to play in this through work placements, case study development and the provision of talks or presentations. Building links and creating partnerships with business organisations/professional bodies was felt to be important in supporting their involvement in the provision of IAG, improving the response to skills shortages and ensuring full employer involvement in course development.

24. Some respondents also commented on the need to give specific consideration to the information and access needs of specific groups, including those with special educational needs and disabilities (SEND), adult learners and other minority groups.

## **Wider impact**

25. There was significant discussion of the barriers faced by different groups in accessing HTE. Respondents wanted a HTE system that successfully overcomes major barriers by ensuring that HTQs have credibility and by providing sufficient funding, targeted support, work environment adjustments, and learning delivery options e.g. virtual learning. In this respect, ensuring that HTQs work effectively for adult learners looking to re-train and switch careers was felt to be crucial.

26. Although support for the consultation proposals was widely expressed, there were some concerns that respondents felt should be given further consideration. Key issues for further consideration were: the fit of HTQs within the complex technical education and HE landscape; fit with the recommendations emerging from the Augar Report; and, an avoidance of greater complexity and bureaucracy.

# 1. Introduction

## Background and context

27. The Department for Education (DfE) launched its review into higher technical education (HTE) in 2017. The review built on DfE's commitments in the Post-16 Skills Plan, which responded to the recommendations in the Sainsbury Report.

28. The review focused on level 4 and 5 qualifications aligned to technical routes – described as higher technical qualifications (HTQ). These qualifications sit between level 3 qualifications (such as A levels and T levels) and level 6 qualifications (such as bachelor's degrees). There are a wide range of HTQs, including Foundation Degrees and Higher National Certificates and Diplomas.

29. Around half of students studying courses leading to HTQs are taught in Further Education Colleges, with a third taught in universities and the remainder taught across other training provider types<sup>1</sup>.

30. The review found that<sup>2</sup>:

- **Uptake of HTQs in England is low** compared to other countries and to other education levels domestically. For example, the review found that only 10% of all adults aged 18 to 65 hold a level 4-5 qualification as their highest in England, compared to around 20% of adults in Germany and as much as 34% in Canada.
- There is **substantial and growing employer demand for higher technical skills**, including acute shortages of technician-level science, technology, engineering and maths (STEM) skills. Degrees and apprenticeships alone are unlikely to fill this gap.
- There are **clear labour market benefits for learners that obtain HTQs**. They are more likely to be in sustained employment and on average earn more than those who stop at level 3. The Centre for Vocational Education Research has found that by the age of 30, males achieving higher vocational qualifications in STEM subjects are observed to earn above many degree holders.
- There is no single reason why uptake is low, but **varying quality** (notwithstanding the good practice that does exist in the sector), **low awareness, understanding and prestige** and a **lack of national assurance** that qualifications meet employer needs are all factors.

31. DfE published interim evidence from the review in August 2018 and further evidence on the qualification and provider market in February 2019. Drawing on the evidence developed

---

<sup>1</sup> Department for Education (July, 2019) Higher technical education: the current system and the case for change.

<sup>2</sup> Department for Education (July, 2019) Higher technical education: the current system and the case for change.

during the review, DfE launched its proposals for consultation on 8 July 2019, alongside a case for change document and its interim impact assessments.

32. The key proposals for consultation were<sup>3</sup>:

- **Prestigious qualifications that are recognised nationally as providing the skills that employers want.**

DfE proposed an opt-in, national system where qualifications at this level can be recognised and signalled as providing the knowledge, skills, and behaviours set out in occupational standards, so that students and employers can have confidence in them. DfE proposed that this be delivered through a straightforward and streamlined approvals process led by the Institute for Apprenticeships and Technical Education (the Institute), working with employers through its Route Panels. DfE also proposed strong incentives for Awarding Bodies to submit qualifications for approval and maintaining the wider regulation of Awarding Bodies through the existing systems provided by Ofqual and Office for Students (OfS).

- **More high-quality courses delivered in FE and HE providers, including National Colleges and Institutes of Technology.**

DfE proposed developing, with the OfS, a set of technical ongoing registration conditions to enable providers delivering courses leading to Institute-approved HTQs to demonstrate and improve the quality of their technical provision. DfE also proposed linking student and provider funding for HTQs to those conditions.

- **That HTE becomes a positive and popular choice both for younger students and for those upskilling and retraining while in the workforce.**

DfE proposed measures to increase the awareness, prestige and recognition of HTE, as well as the information, advice and guidance available to potential students of all ages and employers. DfE also proposed improving the accessibility of HTE through flexible delivery and improved signposting of financial support, and ensuring that students have the ongoing personal support to continue and complete their course of study.

33. These proposals form one part of DfE's wider programme of reforms to strengthen and grow technical education, including the roll-out of T Levels, the National Retraining Scheme and investments in apprenticeships, Institutes of Technology and National Colleges.

---

<sup>3</sup> Department for Education (July, 2019) Higher technical education: Government consultation.

## The higher technical education consultation

34. The purpose of the consultation was to gather views on the proposals summarised above and was aimed at anyone with an interest in technical education and training for young people and adults in England. The consultation was online with an option to submit responses via email. It was open for 12 weeks (closing on 29th September 2019).

35. The consultation had 28 questions including closed (quantitative) questions and open text (qualitative) questions (Appendix Five). The questions were ordered under five headings as follows:

- **Introduction:** contact and organisation information.
- **Higher technical qualifications (HTQs):** the proposed aims of HTQs, the proposals, incentives, approval processes, and the Ofqual and OfS regulatory arrangements.
- **Delivery of HTE:** quality criteria, OfS technical registration, funding proposals, skill needs, resources and costs.
- **Student and employer demand:** demand among adults, young people and employers, the profile and prestige of HTE, the provision of career information and guidance, and feedback on flexible provision.
- **Wider impact:** impact of the proposed reforms to HTE on individuals with protected characteristics, and any additional comments.

36. Six consultation events led by the DfE were held in five locations in England in September 2019. These events focused on specific consultation questions and/or areas selected from the four main headings.

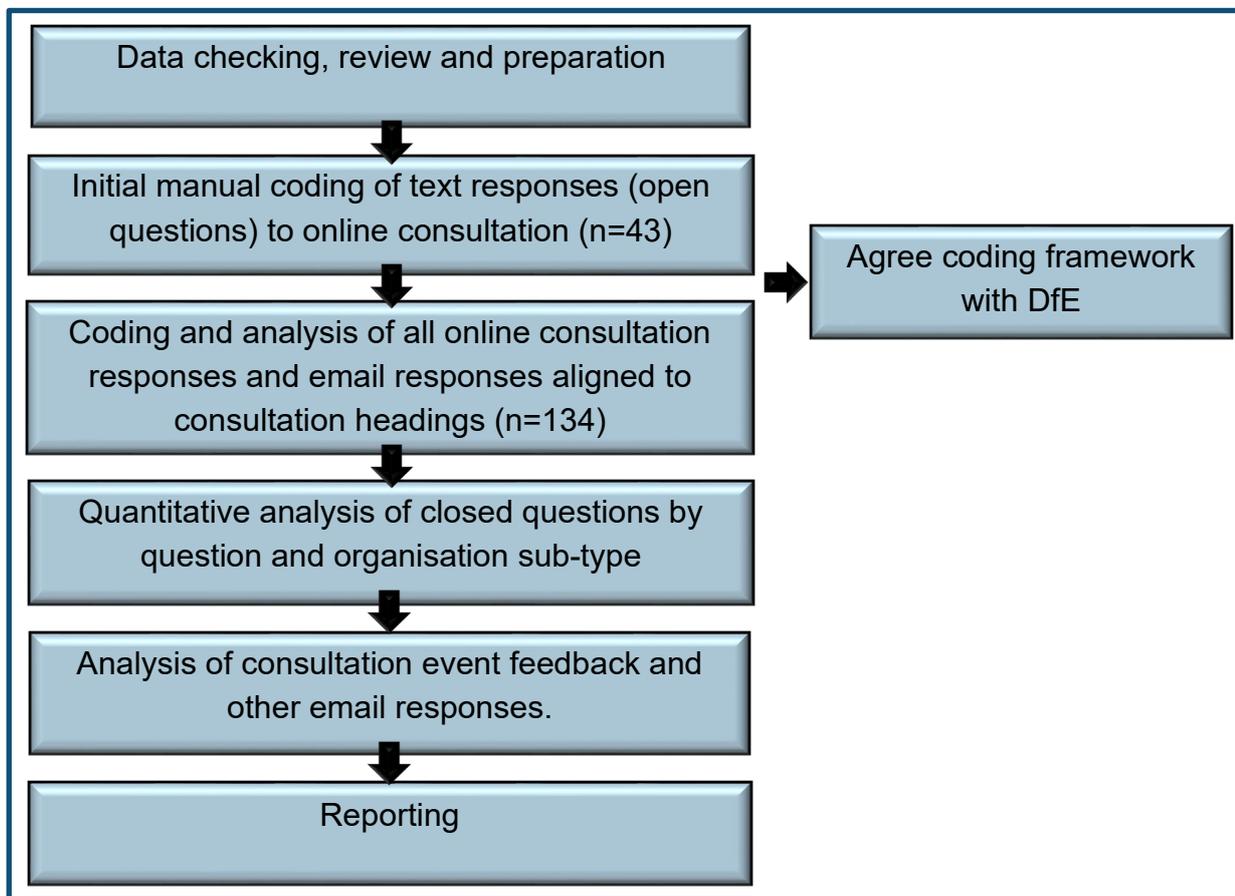
## Aims of the analysis

37. The aim of this project undertaken by York Consulting, was to complete an independent analysis and reporting of responses to the consultation to inform policy development by DfE and its response to the consultation.

## 2. Methodology

38. The methodological approach for analysis of the consultation is shown below.

**Figure 1: Methodological approach**



### Data preparation, coding and analysis

39. Preparation of a draft coding framework for each of the 22 open questions was undertaken. Coding themes were identified using an initial set of 43 responses from the early responses to the online consultation (43 responses had been received at 13th September 2019). This approach was based on selecting up to 10 key themes per question.

40. Confirmation was sought from DfE that the draft coding framework met their expectations regarding the scope of anticipated responses. Feedback on themes was incorporated into the coding process where relevant.

41. Further review and revisions of the coding framework were undertaken once the final set of online responses was made available (30th September 2019).

42. Data sets were uploaded to *NVivo 12* qualitative data analysis software. This involved the following:

- Responses were converted into a *Word* format and imported into *NVivo* on a question by question basis.
- The themes from the coding framework were set up as thematic 'Nodes' in *NVivo*.
- All respondent data (online consultations and inputted email responses) were coded under the thematic nodes (this included 'other' coding).
- Where the number of references for each code exceeded 50, further sub coding was undertaken in *NVivo*.
- Review of each code by numbers of references was used to determine the final coding framework (see Appendix Two). In cases where the number of references was very low (under 5) consideration was given to merging these into other codes.

43. All coded data was retained in *NVivo* and results from all the coding recorded (see Appendix Two) including:

- The number of themes for each question and a brief description for each (an additional 'other issues' code was created for each question to capture any additional disparate themes).
- The number of coded references for each theme (node).

44. All coded data was analysed for each theme to identify recurring issues, where there were multiple references, areas of consensus, and other feedback of specific interest or relevance. Quotes from responses have been used to illustrate themes and key points throughout. The themes were reviewed in line with the different respondent sub-groups to identify any differences between them.

## Analysis of email responses

45. Responses to the HTE consultation that were submitted to DfE by email were collated. The process for this included:

46. A review of all the email responses was undertaken (n=23 submissions) to assess content. Specific consideration was given to the extent to which emailed responses were aligned to the questions included in the online consultation. On this basis the coding and analysis was undertaken in relation to one of two different options.

47. **Option One:** The emailed submissions in this group (n=14) provided responses to quantitative and/or qualitative responses to questions and these were aligned to the four main section headings. This set of responses was then manually added into the online consultation results. Only two of this group provided responses to quantitative questions (as such the response totals for quantitative and qualitative questions were different).

48. **Option Two:** The emailed submissions that did not conform to the questions or the consultation sections formed a second group. This set included responses that set out concerns, conclusions and/or recommendations about the HTE proposals. Due to this non-

alignment with the online consultation format these responses (n=9) were analysed as a discrete group and are reported in Appendix Three. The expressed views, concerns and recommendations were coded to the three consultation sections and recurring themes identified for each.

## Consultation events

49. The qualitative data collected by the DfE from the six consultation events was reviewed. This was coded under the four consultation headings and has been included in Appendix Four. The results from this exercise were compared to those from the main consultation responses with specific reference to areas of consensus and where diverging views were expressed including at relevant points in Chapter 3.

## Analysis of consultation data: challenges

50. A range of challenges and barriers were encountered during the analytical process. These related to the quality of responses provided by those participating in the consultation and caveats about the representativeness of the dataset (Table 1).

## Report Structure

51. The remainder of this report is structured as follows:

- **Chapter 3: Results:** this chapter provides a breakdown of the respondent group and key findings from each of the consultation sections reported under the questions included in the section:
  - A: Respondent characteristics (questions 1-6).
  - B: Higher technical qualifications (HTQs) (questions 7-12).
  - C: Delivery of higher technical education (HTE) (questions 13-22).
  - D: Student and employer demand (questions 23-26).
  - E: Wider impact (questions 27-28).
- **Chapter 4: Conclusions**
- **Appendices.**

**Table 1: Key barriers and challenges of the data**

Challenges	Response/Constraints
<i>Quality of responses provided by those participating in the consultation</i>	
<b>Length and detail of responses.</b> Some of the respondents provided long, complex and very detailed information in their answers to individual questions. Wide ranging and detailed responses were frequently provided to the earlier sections of the consultation, and in many instances the respondents addressed subsequent questions as part of their initial answers.	The analysis, particularly of initial questions, has been focused on describing the range of issues raised by respondents in order to avoid repetition across the reporting. However, some repetition has been unavoidable.
<b>Additional information links.</b> Respondents in some instances included references to web-based material to support their arguments or to signpost to sources of evidence.	Any web addresses included in a response have not been incorporated into the coding process.
<b>Factual reporting of information.</b> This report conveys the key messages arising from the analysis of the consultation responses and, where appropriate, highlights these with word-for-word quotations.	The report intentionally does not provide challenge or critique on either the key messages or the quotations, e.g. by highlighting where respondent views may not be factually accurate.
<b>Wider response to questions.</b> Many responses were inconsistent with the question being asked, or in addition to providing a level of response to the question asked, then moved into another subject area.	This made the task of coding more complex and introduced greater subjectivity to the analysis.
<i>Caveats about the representativeness of the dataset</i>	
<b>Participation in the consultation</b> was on a self-selecting basis.	The findings in the report therefore carry the unavoidable risk of self-selection bias, i.e. they may not be representative of the views of all stakeholders.
<b>Balance between types of respondents.</b> The consultation invited response from both individuals and organisations.	It is likely that organisational responses reflect the perceptions of a large group of individuals (e.g. from within a single institution). As such organisational responses may be considered more representative than those from individuals.
<b>Changes to consultation tool.</b> Question 15 was subject to revision after the consultation had been started. Question 15 was made up of a main statement with 4 sub-statements. Originally, the response options were from 'strongly agree to strongly disagree' on the 4 sub-statements under the one question, with no option to respond to the main statement itself. Further to concerns about this confusing respondents, the structure was amended so that the main statement remained as Question 15 with a response required of options between 'strongly agree' to 'strongly disagree'. The former 4 sub-statements then became individual open questions (Question 16-19). This was updated on the 5th August.	The first 35 respondents did not have the opportunity to respond in the same way and no data was collected for this question from these respondents.

### 3. Results

#### A: Respondent characteristics

52. There were 28 closed quantitative questions, including sub questions, in the online consultation. The total number of responses given to the closed (quantitative) consultation questions was 134 (1+2a respondents (Table 2)). The **134** responses included 96 organisation responses and 34 from individuals (4 respondents did not identify themselves as one or the other). Responses were from across a wide range of areas in England and national organisations.

53. The total respondent group for the qualitative (open) questions was **146** (1+2a+2b). The difference is due to email responses that provided text response but did not include responses to quantitative questions (n=12).

**Table 2: Responses from all sources**

	Response sources	Number of responses
1	<b>Online consultation (n=132)</b>	
	Online consultation responses	132
2	<b>Email responses (n=23)</b>	
a	Email responses that included answers to the closed (quantitative) questions	2
b	Email responses that included answers to the open (qualitative) questions but not the closed (quantitative) questions	12
c	Email responses that were not set out in response to specific consultation questions (see Appendix Three)	9
	Total responses from the online consultation and email responses	<b>155</b>

Source: York Consulting quantitative analysis, 2020

54. In addition, DfE provided written summaries of consultation events (n=6), attendees, of which, may have also responded as part of the online consultation (see Appendix Four).

55. The respondent group was made up of responses from seven different sub-groups as shown in Table 3. The largest group was professional/business organisations, followed by providers (HE) and providers (FE).

**Table 3: Organisation sub-type**

<b>Organisation sub-type</b>	<b>Number</b>	<b>Percentage</b>
Awarding body	13	9%
Education <sup>4</sup>	18	12%
Employer	7	5%
Professional/business organisation <sup>5</sup>	47	32%
Provider (FE)	23	16%
Provider (HE)	31	21%
Other	7	5%
<b>Total</b>	<b>146</b>	<b>100%</b>

Source: York Consulting quantitative analysis, 2020

---

<sup>4</sup> Education sub-type includes: school responses, education consultants and teachers.

<sup>5</sup> Professional/business organisations includes: professional associations or institutions, business partnerships or organisations, education associations and regional bodies/skills organisations.

## B: Higher technical qualifications (HTQ)

### Summary

The HTQs part of the consultation asked respondents about the proposed aims of HTQs, a range of issues relating to the approvals process, including copyright, incentives and incorporating various flexibilities or requirements, and the wider regulatory framework.

### Aims of HTQs

There was **strong support for the proposed aims of HTQs**, with nearly all respondents agreeing (96%) and the majority strongly agreeing (52%). Awarding bodies and HEPs were less likely to strongly agree. Open text responses indicated:

- **Differing views on a voluntary approach to approval.** Respondents were split between those who saw the benefits of this approach and those, particularly HEPs, who had concerns about complexity and risking a two-tier system.
- **The approval process** was expected by respondents to be clear, fair, transparent, streamlined and in-line with existing systems. The importance of employer representation in the process being representative and diverse (not dominated by large employers) was emphasised.
- **Mapping qualifications to occupational standards.** Where supported, it was felt this would support entry to skilled employment and create consistency in delivery. Those not supporting it raised concerns about how this would work in reality.
- **Resources and timescales associated with approval.** The volume of approval work required within a challenging timescale was a concern.
- **Employer involvement.** There was support for long-term employer engagement. Employer awareness of the Institute and OfS was considered to be low, requiring a strong communication campaign to raise awareness.
- **Impact on existing qualifications.** There were concerns about additional burdens or new qualifications resulting in withdrawal of qualifications and destabilising the system.
- **Differing views on content.** Some argued that practical skills must be the prioritised to ensure industry experience. Others felt that education content was imperative to provide the transferable skills required to sustain a long-term career.

### Issues relating to the approvals process

**Over half (61%) agreed that following the approval of a HTQ there should be no transfer of copyright.** 'Neither agree or disagree' was selected by more than a third of respondents (37%). Awarding bodies and HEPs had stronger levels of agreement.

- Respondents that felt there should be no transfer under any circumstances often cited intellectual property concerns and the investment required to develop qualifications.
- Those with more neutral views suggested circumstances where transfer might be appropriate, notably when a holding body stops trading or risk of market failure.

**A competitive funding package was regarded by ABs and HE providers as the most important in incentivising the submission of qualifications** for Institute approval. This was followed by a swift and straightforward process and a clear mark of labour market relevance. Enhanced IAG was ranked as less important, but the qualitative evidence indicated that all four incentives were considered valuable:

- **Competitive funding.** Respondents raised issues of reducing funding complexity and equity with funding of other similar qualifications.
- **A swift and straightforward process** was felt useful for employers by ensuring responsive qualification development, but it was not regarded as an incentive itself.
- **A clear mark of labour market relevance.** Respondents described the importance of considering future proofing and the kite marking of HTQs. Although some felt existing, recognised qualifications did not require any additional enhancement.
- **IAG.** Despite a lower ranking (because it was not considered a driver for qualification submission to the Institute) there were extensive comments about IAG. In particular, the role IAG could play in raising the profile of HTE from school onwards, communicating clear career pathways and channelling information through employers.

**Respondents agreed with the incorporation of particular flexibilities/requirements in the approval process.** There were particularly high levels of agreement with incorporating additional content (95%), broader qualifications (85%), flexible learning (92%) and professional body standards (85%). There was less agreement with incorporating a period of work-based learning (60%), maths (57%) and English (57%).

- Qualitative responses strongly supported various flexibilities, arguing they would help respond to employer and sector needs (although some cautioned that excessive flexibility may 'dilute delivery' and risk standardisation). Flexible and modular learning were seen as supporting returners and those unfamiliar with higher level education.
- Some highlighted the importance of alignment between professional body standards and occupational standards and questioned how this would be achieved.
- While many saw advantages in work-based learning, others raised concerns about organising and monitoring placements, stressing that they should not be mandatory.
- In relation to maths, English and digital skills, respondents were split between those who thought a minimum entry requirement should exist, and others who saw this as a barrier and argued that they should be built in to HTQs.

### **Wider regulatory framework**

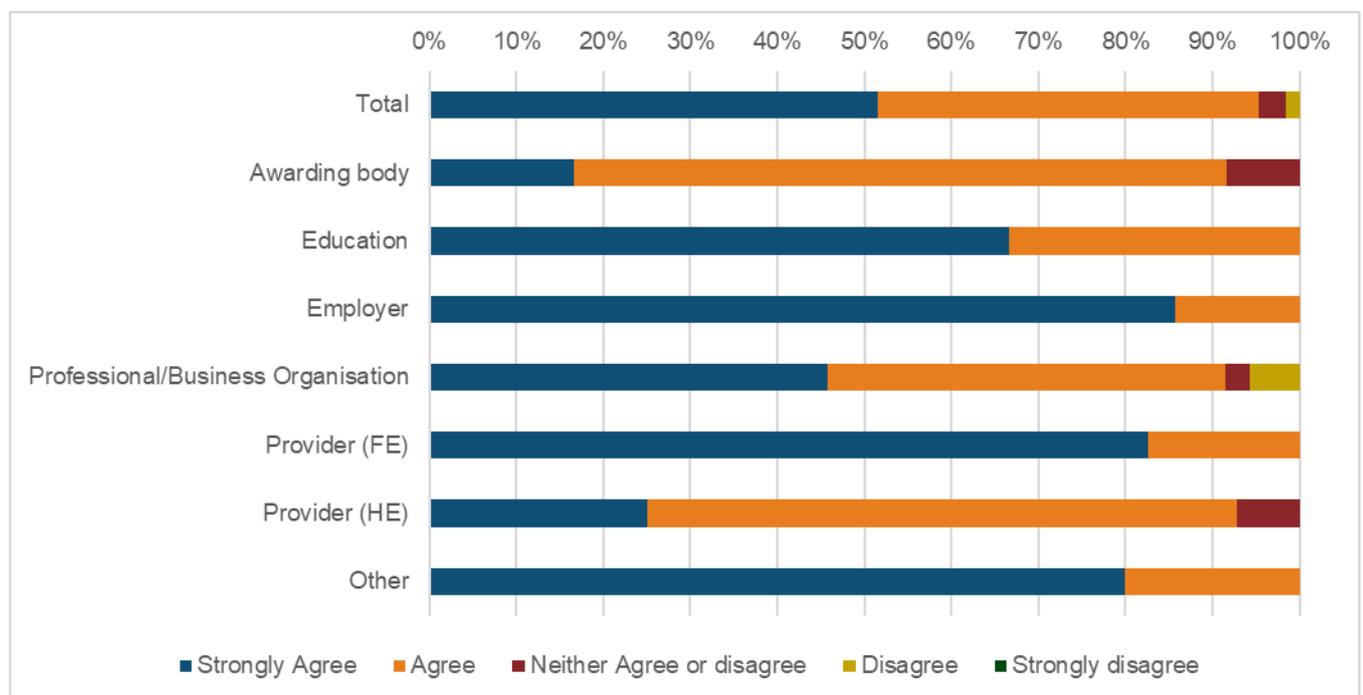
The **majority agreed with DfE's proposed approach to retaining existing Ofqual and OfS regulatory arrangements of awarding bodies.** There was, however, a general desire for regulatory arrangements and the roles and responsibilities of the different regulators to be clearer, and some felt the proposed reforms were a missed opportunity to harmonise and streamline the regulatory environment.

## Question 7. To what extent do you agree or disagree with the proposed aims of HTQs?

56. Figure 2 outlines responses to Question 7, displaying the extent to which the survey respondents agreed to the proposed aims of HTQ set out below:

- Deliver the knowledge, skills and behaviour that are need for an occupation(s) and valued by employers.
- Be understood and recognised as high-quality by employers and so have labour market currency.
- Give students confidence that qualifications are recognised by employers and are seen as a credible and prestigious alternative to other options such as direct entry to a degree or apprenticeship.

**Figure 2: Question 7. (n=128 responses)**



Source: York Consulting quantitative analysis, 2020

57. The number of responses to this question was 128 (96% of all respondents). The majority of survey respondents agreed with the proposed aims of HTQ (96%) with over half of respondents stating they 'strongly agree' (52%). Only two out of the 128 respondents disagreed with the aims. Strong agreement was more likely amongst employers and FE providers, whereas HE providers and ABs were more likely to only agree.

## Question 8. 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?

58. 113 respondents provided qualitative responses to Question 8. Responses were relatively detailed and covered perceptions on a wide range of areas. Many of the themes discussed interconnected and overlapped and, in several cases, framed responses for subsequent consultation questions.

59. The highest proportion of references related to:

- The structure of the approval process.
- Mapping qualifications to occupational standards.
- Resources and timescales associated with the approval.
- Impact on existing qualifications.
- Qualification content.
- Voluntary approach to approval, market complexity and the potential of introducing a two-tier system.
- Employer involvement.

### The structure of the approval process (87 references)

60. Comments made regarding the approval process related to how the process should ideally operate, methods to help streamline it and ensure robustness, the use of expert panels and groups, as well as other areas of concern and requests for clarification.

61. Respondents expect the **approval process to be clear, fair, transparent, streamlined, in-line with existing systems and not overly burdensome or bureaucratic**. Clear and timely communication of timescales and milestones was felt to be essential in ensuring ABs have adequate time to respond, consider criteria and compose comprehensive, high-quality submissions.

62. It was argued that the apprenticeship approval process created substantial unnecessary barriers and delays to programme development and that lessons had to be learned from this so ABs are not deterred from applying.

63. To help streamline the process and ensure fairness and transparency, a number of suggestions and/or requests were made:

- Approval templates should be standardised to ensure consistency.
- Training and high-quality information and guidance is required to ensure ABs are well-informed of processes.
- Involvement of, and research / consultation undertaken with, stakeholders from the outset in the design of curriculum and assessment frameworks is necessary to ensure they are fit-for-purpose.

*“We recommend that awarding body representatives (and PSRBs) are part of this discussion from the outset, to build positive working relationships and ensure workable processes.”* Professional/business organisation

- DfE should consult with the Quality Assurance Agency, Higher Education Statistics Authority (HESA), Professional, Statutory and Regulatory Bodies (PSRBs) and providers about existing processes and how they can be integrated with the proposed process of HTQ approval.
- Written feedback on applications should be provided at key stages:
  - Decisions and reasons for them should be comprehensively documented and communicated.
  - Once feedback has been addressed, resubmitted qualifications should be fast-tracked and reviewed only against issues raised.
- There should be mechanisms for ABs to feedback on the kitemarking process to refine and improve it moving forward.
- There should be a transparent procedure in place for complaints and appeals, including an independent channel for a final appeal, with information on how these will be handled and clear timelines.

64. Several recommendations were made on the **expertise of Route Panels or Trailblazer groups**:

- Panels or groups should have appropriate expertise:
  - The structure of panels and roles and responsibilities of members need to be clarified.

*“They should operate under standardised governance rules with regards to terms of office, group turnover and appropriate representation, which should be well defined”.* Professional/business organisation

- Panels are broad and so reassurance is required that panel members will have the knowledge to make sound judgements, especially regarding speciality subjects.
- There is a potential need for provider / delivery partner input to ensure a sound understanding of the practicalities of delivery.
- Panels should have in depth knowledge of curriculum and assessment frameworks.
- Panels should draw on pedagogical expertise to ensure standards recognise effective learning models as well as industry best practice; a purely employer-led initiative may not result in the most robust set of recommendations.

*“The risk is that overlaying another set of requirements managed by a body without educational or assessment experience may complicate the*

*development of high-quality HTE and potentially miss the point about what constitutes high-quality, if too narrowly focused.” Awarding body*

- The creation of Route Panels should not be a rushed process – the right people with the right expertise should be involved from the outset.
- Panels or groups should be diverse and representative with clear representation of small and medium-sized enterprises (SMEs), regional differentiation and niche areas / specialisms.

*“It is necessary to be mindful also both of how local/regional needs may differ from the national view and how industry route panels are reviewed to ensure that SME needs are appropriately reflected rather than just panels which largely consist of large employers.” Provider (HE)*

- Panels or groups should be transparent, with some respondents concerned about panels or groups being “exclusive and secretive” and this creating barriers to other groups forming.
- Employers have limited capacity and will need innovative and simplified ways to engage.

65. A number of **additional concerns with the approval process or areas of uncertainty** were also raised:

- Phased approval process:
  - A phased process could mean a long wait to gain access to approved qualifications, with some high-quality qualifications not being recognised and perceived as lower quality.
  - The focus on phasing to match the T Level roll out might signify that HTQs are only a suitable progression route for T Level students (as opposed to those also studying A levels and Applied generals or adults returning to education or upskilling).
- Centrally driven approval process:
  - There is a need to recognise that the situation with HTQs differs to T Levels as many ABs operating in this area are highly autonomous and have well-established markets and strong links with industry.
  - There is a concern that a central process will not account for the fact that many professional bodies have existing accreditation processes, associated assessment methods and require the learning outcomes of qualifications to be mapped to competency frameworks.
  - It was felt by some that the proposed process breaks from long-standing approach to quality assuring higher education and that universities may need significant incentives to go through a non-statutory approval process.

- There was concern that a national approval process may disengage local and regional employers from participating in developing qualifications.
- Some respondents felt that the proposals created multiple regulatory layers with a risk of over-regulation.
- Existing provision:
  - For providers who are already delivering courses leading to HTQs, clarity was needed on the impact the proposals would have in terms of: institutional autonomy, ownership of the qualifications; qualifications not aligned to occupational standards; and, assessment methods.

66. Regarding the approval process, the following **clarification requests** were made:

- In general, further information was thought to be required to give respondents confidence that it will be a fair, transparent, “*streamlined, straightforward and timely*” process and that unintended consequences have been considered.
- Further information was also required to give respondents confidence in the expertise of assessors and decision-makers, with some noting that employers may not have the right assessment expertise.
- More details were requested on the resubmission and appeal processes.
- Detail were also requested on the benchmarks to be used in the approval process (e.g. the higher education design benchmarks, the Framework for Higher Education Qualifications and/or Subject Benchmark Statements).
- Assurance was required that the approval process would extend to all organisations responsible for recognising and awarding vocational education and training and not just those that fall within the traditional definition of awarding body or organisation.

### **Mapping qualifications to occupational standards (45 references)**

67. Where supported, the **proposal to map qualifications against occupational standards, was felt to be a positive approach** to supporting entry to skilled employment and creating consistency in delivery. It was felt that a strong, high-profile and widely recognised brand would be crucial to the success of HTQs and this approach would be valuable in achieving this.

68. Nevertheless, **concerns were raised about how this would look in reality** and respondents had several reservations regarding the degree to which occupational standards would be fit for purpose with questions raised around the appropriateness of mapping qualifications to national occupational standards alone.

69. In relation to potential gaps in provision, respondents felt that:

- The completeness of maps and the evidence base used to derive them needs to be carefully considered.
- Currently there are areas and sectors where occupational standards do not currently exist, and clarification is required on how ABs approach this.

- Not all level 4 and 5 qualifications will, or necessarily should, map to occupational standards; it was perceived that there is a valuable role for qualifications where skills and competencies need breadth and development but do not necessarily need to be linked to particular occupational outcomes.
- There is the potential for losing important areas of vocational education.

70. The design of standards was considered extremely important:

- A range of expertise needs to be embedded in the formulation of occupational standards to ensure that not only industry perspectives are captured but that they also translate into meaningful learning programmes.
- Communication is essential to enable ABs to be aware of the standards review process and to have the opportunity to comment and feedback on any areas of concern.
- Version control is required to ensure ABs are aware of which version of standards qualifications need to be mapped against.
- Standards should not be skewed towards the needs of certain employers.

71. Clear, up to date maps and definitions were thought to be key, with respondents commenting that:

- Early and ongoing review of occupational standards would be required to ensure relevancy and fitness for purpose.
- Industries and markets are developing at a fast pace and education and training should mirror these developments.
- There is a need for flexibility to ensure future-proofing. Qualifications should not only be designed focusing on the current need, but also prepare learners for the future labour market.
- Current standards are not broad enough to cover the breadth of technical requirements.
- It is important to ensure a higher degree of alignment between HTQs across the devolved nations than currently exists for apprenticeships.

72. The objectives of HTQs were felt by some to need further clarification. Some respondents felt a “*reductive and heavily competence-based approach*” to learning may result in the narrowing of the curriculum and risk qualifications that are too role specific. There was felt to be a benefit to qualifications that focus on a wide range of knowledge, skills and behaviour needed for the workplace, including transferable skills.

73. There were concerns in relation to approving qualifications against more than one standard:

- Consideration needs to be given to the balance between generalisation and specialisation.
- Qualifications against too many standards may lose specification but equally may widen career options.

74. Respondents felt that proposals should aim to incentivise innovation:

- ABs should be encouraged to offer new qualifications tailored to local need as well as the wider economy and employers.
- There is potential for additional incentives for new provision where there are currently gaps and where demand for skills is greatest.

*“Many roles in the creative sector require broader skills that are less easily captured in a specific occupational standard. For example, broad communication, research, analysis, design, iteration and project management capabilities at levels 4, 5 and 6 characterise the requirements of many roles in the creative sector in a way that is a pre-requisite for specific sub-sector roles (e.g. graphic designer, set designer, advertising creatives).”* Awarding body

75. A number of points for clarification were raised regarding the mapping of occupation standards to qualifications, these included:

- More clarification required on who will be involved in defining occupational standards.
- Clarification on the extent to which apprenticeship standards will be used to define occupational standards.
- Whether courses that already conform to professional accreditation that matches relevant standards will receive the HTQ kitemark.
- Whether courses will retain existing branding that has established, widespread credibility (e.g. HNCs).

### **Resources and timescales associated with the approval (39 references)**

76. The **scale of the task and volume of approval work required within what is considered to be very challenging timescales was a major concern** for a substantial number of respondents. While standardisation was largely felt to be a positive development in principle, respondents want confidence that an appropriate level of governmental resources and capacity will be committed to take on the significant increase in workload required to meet proposed timings for roll out, without compromising quality. A number of references were made to recent experiences regarding the perceived delays and onerous processes involved in the development of apprenticeships and respondents were keen that similar occurrences are not repeated.

*“The sheer volume of approval work required to achieve first teaching of first approved HTQs in 2022 is of concern. How will [the Institute] be resourced for the influx of approvals and when will the approval window open? If the intention is to take a phased approach to [Institute] submission, there may be implications. If a phased approach is taken the transition to the new system could take years; how will inconsistencies in*

*funding rates be managed and might we see provision following the funding until there is a level playing field?” Professional/business organisation*

*“To what extent is the Institute able to scale to meet demand. There are 150 HEIs with awarding powers; it is likely each participating university will design their own version of other qualifications. How will the institute a) deal with the volume and b) ensure equity across providers?” Provider (HE)*

77. It was argued that the drive to meet high-quality standards should not be impeded by duplicative layers of administration. In addition to the approval process itself, it was felt that consideration needs to be given to the level of time and resource required to implement key aspects considered fundamental to the success of HTQs and relevant, high-quality design and delivery, notably:

- Building in a thorough and robust review and agreement process for occupational standards.
- Assembling Route Panels and Trailblazer groups with relevant expertise, knowledge and willingness to commit long-term.

### **Impact on existing qualifications (35 references)**

78. The existence of qualifications that are already road-tested, fit-for-purpose, quality assured and meet standards (or would with minimal modification) was widely discussed. It was thought **important to maintain (and build on) stability and familiarity with well-recognised, quality provision** that meets the needs of students, industry and providers.

79. It was argued that the reforms should not devalue or displace existing qualifications, particularly where content is already fully relevant to a sector and supports its knowledge, skills, behaviours and competency needs. There was a concern that, in some areas, there is a risk that much-needed, high-quality, relevant provision may be withdrawn due to the opt-in incentive not being compelling enough or that approval requirements and costs would be too restrictive or prohibitive.

*“Many professional bodies offer qualifications at level 4 and 5 as part of their membership package. These qualifications are already considered to represent the industry standard and are often treated as prerequisites for access to particular jobs or sectors. Given this, is there a need to create an entirely new framework of recognition, which could undermine the value already well established for these qualifications?” Awarding body*

## Qualification content (25 references)

80. The **balance between practical and academic elements of qualification content was discussed** by a number of respondents and views varied in some cases. Some argued that the practical skill aspects must be the priority and not diluted in favour of theory to ensure that learners have a true “*hands-on*”, real-industry experience. Others, however, felt that building in pedagogical and education content was still imperative to provide the overarching, transferable skills required to sustain a career long-term, rather than just those required to undertake a specific job.

81. According to some respondents, this highlighted the need for further discussions on the content of qualifications. These respondents believed that more analysis and clarification was required on the definition of qualifications, for example, the differences between non-prescribed technician qualifications and higher education, “*work-focused*” qualifications.

*“They must be largely skill based, evidence through practical work, not a large portfolio dominated by photographic evidence and overwhelming written work.”* Education

*“Finally, we believe it is crucial that, as higher education qualifications, HTQ do have academic higher education content and a corresponding award. We are aware, for example, that some higher and degree apprenticeships do not contain an actual academic award and only an end point assessment certificate.”* Professional or business organisation

*“Two-way proactive dialogue and wider communication is also essential in those areas where it is decided taught provision is not regarded as appropriate. Feedback will need to be written in a tactful and supportive way, especially where a course/content is deemed to be in any way at variance with what is regarded as desirable by the Institute.”* Provider (HE)

## Voluntary approach to approval, market complexity and the potential of introducing a two-tier system (24 references)

82. **Responses varied as to whether a voluntary approach to approval was appropriate.** Where respondents agreed (around half of those that expressed a view), it was due to the perception that this was a non-restrictive way of ensuring flexibility is built into the system and that forced or coerced approval may result in ABs opting out of level 4/5 qualifications altogether, resulting in a reduction of choice and capacity at this level. Some respondents felt that a voluntary approval process had the potential to rationalise the market and that qualifications would be put forward when a need and demand for them had been identified. As such, it was felt that sectors most in need would benefit sooner, with qualifications manageably drip-fed through the approvals process and dealt with efficiently.

*“Higher Technical qualifications must be developed as a strong brand that providers want to obtain, not one that they are forced into. This is particularly the case as the programmes and standards develop. Some providers are unable or unwilling to submit standards but will submit qualifications should a standard be developed that fits their programmes. While the system relies on providers to invest in the development of standards, it must remain voluntary”.* Education

83. However, others disagreed with the proposals for a voluntary system (around half of those that expressed a view). For some, it was felt that this approach could result in an inconsistent, two-tier market which had the potential to be confusing for relevant audiences including employers, educators and students and, in some cases, act as a deterrent to ABs engagement. It was argued that a mandatory system was essential to ensure robustness was embedded and indicated. There was a concern that a voluntary approval system would not guarantee an appropriate uplift in quality and that there was a risk that the high-quality learning outcomes required to enable progression beyond HTQs, would not always be entrenched.

*“Finally, and crucially, if the system is to be opt-in there is a high risk that the result of implementing these proposals either results in no change because the incentives are not sufficient for Awarding Bodies to opt-in, or results in an even greater number of different level 4/5 qualifications as some Awarding Bodies (and providers) choose to keep non-approved qualifications while others move to new HTQs. One possible answer is that should an awarding body redevelop an existing qualification as an HTQ it commits to phasing out the original qualification over a period of time following approval. This does not however deal with qualifications which are not submitted for approval, or those which are submitted but rejected, and which could feasibly continue to attract any public funding they are currently entitled to”.* Professional/business organisation

84. Others, largely universities, disagreed with the proposed approach as it was believed to undermine the credentials of organisations that already undergo rigorous quality control procedures. This point is discussed further in the ‘Impact on existing provision’ section.

85. Whether the approach is voluntary or not, several respondents argued that there needs to be a pro-active approach from government and the Institute to help identify local and national areas of need and stimulate and incentivise submissions where there are skill gaps that require filling.

### **Employer involvement (24 references)**

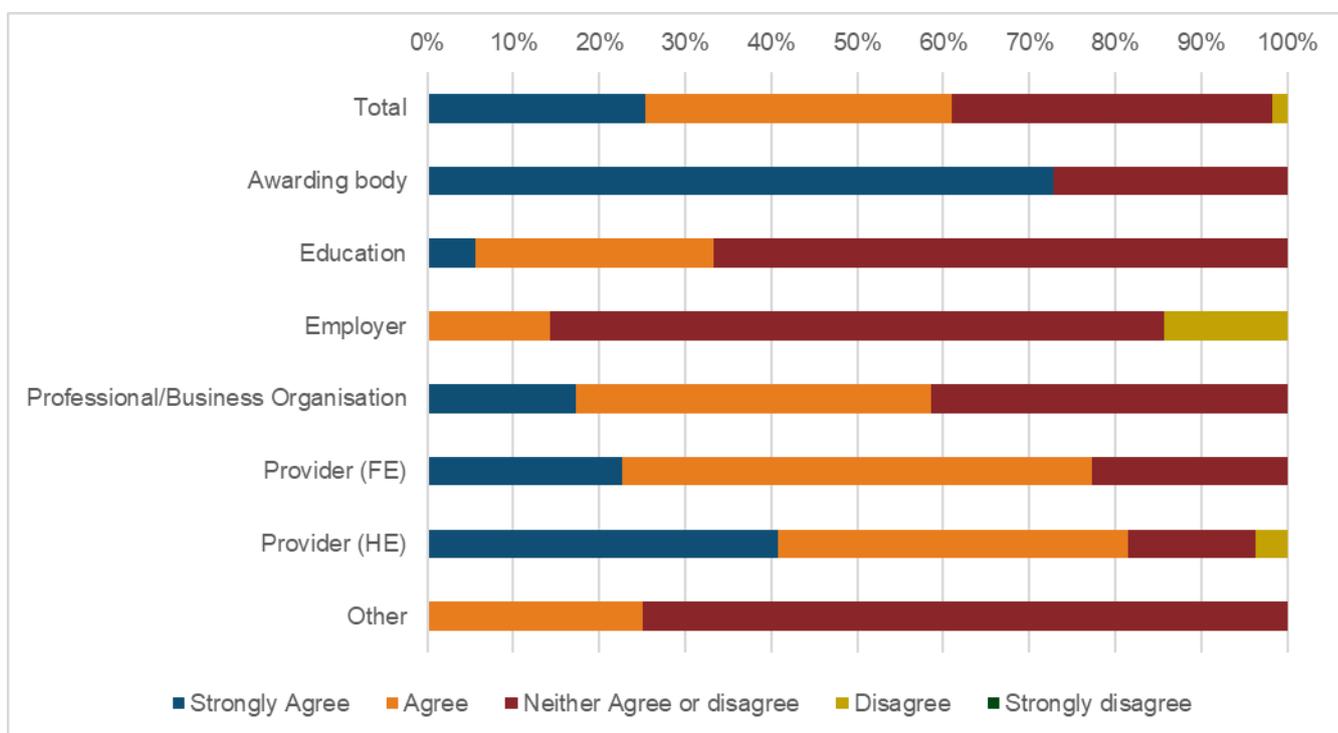
86. There was a general emphasis in the responses that **input needs to include the views and experience of a wide-range of employers**, that the formation of groups should be an

open and transparent process and that employers should be encouraged to commit to the process long-term. However, while it was agreed that an employer-led approach is important and that qualifications should be supported by industry endorsements, the experience and perceptions of other relevant stakeholders was considered equally important.

87. It was stated by some that employer awareness of the Institute and OfS is not currently prevalent and that, as such, national approval by these organisations may not have a great deal of standing amongst employers. This was felt to reinforce the case for a sustained, high-profile, government-backed HTE campaign.

### Question 9. What is your view on our proposal that, upon approval of a HTQ, there should generally be no transfer of copyright?

Figure 3: Question 9. (n=118 responses)



Source: York Consulting quantitative analysis, 2020

88. The number of responses to Question 9 was 118 (88% of all respondents). Over half (61%) responded positively, agreeing that following the approval of a HTQ there should be no transfer of copyright (Figure 3). ‘Neither agree or disagree’ was the most frequent response, selected by more than one third of respondents (37%).

89. ABs were more likely to strongly agree. The sub-types with the highest level of uncertainty, stating ‘Neither agree or disagree’, were ‘education’ (12 out of 18) and ‘professional/business organisation’ (12 out of 29). This may indicate the lack of awareness from these respondents in relation to the transfer of copyright of HTQ’s.

## Question 9. What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?

90. A total of 83 respondents provided a qualitative response to Question 9. As highlighted in the survey results, the strength of agreement was that there should be generally no transfer of copyright. Some respondents went further to say there should be no transfer under any circumstances due to intellectual property reasons and the time and investment it takes for organisations to develop qualifications.

91. Those that had more neutral views suggested a number of circumstances where transfer of copyright might be appropriate, notably when a holding body ceases to trade or there is a risk of market failure.

### Organisation insolvency, market failure or priming the market (39 references)

92. A number of respondents agreed with the protocols outlined as circumstances under which copyright transfer might be appropriate with some additional comments:

- **The Institute's involvement was considered unnecessary by some**, as adequate measures and mechanisms are already thought to be in place to protect qualification delivery and learners in the event of AB insolvency e.g. transferal to another AB.
- **The proposals were felt to be contradictory or unclear** in the case of very specialist qualifications. Further information was needed on who is responsible for finding an alternative to ensure qualification is continued and whether another AB can use the content in their qualifications without incurring a penalty.
- **Discontinuity may occur through unviable learner numbers** and DfE should consider how to protect courses that are strategically important to industry but traditionally attract low numbers.

### Protecting intellectual property (28 references)

93. **Resistance to the transfer of copyright was largely due to concerns that it would be detrimental to the development of HTQs** and stifle innovation and competition. Intellectual property was seen as an important characteristic within technical provision that it should be protected and maintained. Costs associated with qualification development were considered significant, with providers wanting to maintain control over unique course content. It was argued that any risks to intellectual property could disincentivise voluntary entry into the process and erode the development, depth and quality of HTQs tailored to local needs and serving niche areas.

*“While we understand that the transfer of copyright in the areas set out (e.g. priming or protecting a market with a very small number of qualifications suitable for approval) has been suggested to protect the market, we would consider this to be a major disincentive as it would limit appetite for development of qualifications in more niche areas...We*

*therefore do not support the transfer of copyright proposal as outlined.”*

Awarding body

### **Protecting students' interests (13 references)**

94. A number of general comments were made about the **importance of protecting the learner under circumstances where qualification delivery is at risk** and that any approach should make this a priority. To ensure delivery continues and learners are safeguarded, it was suggested that ABs should have risk assessments and “*exit plans*” in place that outline the copyright transfer protocols for qualifications and ensure continuity in the event of enterprise failure.

*“In the advent of the failure of an AB, be that operationally, through bankruptcy or disaster, the chief immediate concern will be for the interests of learners. Here the immediate concern is operational capacity to ensure that learners can be assessed and receive awards.”* Awarding body

### **Question 10. This question is for ABs 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).**

95. Respondents were asked to rank incentives in the order they believe best encourages the submission of qualifications for Institute approval. In total 58 respondents replied to this question but only 35 of these were ABs and HE providers, so this analysis has been limited to the 35 valid respondents. To simplify the analysis, the option ‘e. other (please specify)’ has been removed, leaving the four remaining incentives listed below:

- a. A clear mark of labour market relevance.
- b. A competitive funding package.
- c. Enhanced information, advice and guidance.
- d. A swift and straightforward process.

96. A scoring system has been created to analyse what the cohort classifies as the most to least important incentive. The incentive scoring system is outlined below:

- An incentive ranked as most important – 4 points.
- An incentive ranked as 2<sup>nd</sup> most important – 3 points.
- An incentive ranked as 3<sup>rd</sup> most important – 2 points.
- An incentive ranked as least important – 1 point.

97. The results of the scoring system are displayed in Table 4 and the findings have been illustrated below:

- The incentive that scored the highest total points (94) and average points (3.03 out of 4) was 'b. A competitive funding package'.
- The second highest total points of 88 (and average points of 2.75) related to 'd. A swift and straightforward process'
- Closely behind was 'a. A clear mark of labour market relevance' with 84 points (and an average points of 2.40).
- The option, 'c. Enhanced information, advice and guidance', scored significantly lower in both the 'Total points' (58) and the 'Average points' (1.87 out of 4).

**Table 4: Question 10<sup>6</sup>**

	Total votes*	Total points	Average points
a. A clear mark of labour market relevance	35	84	2.40
b. A competitive funding package	31	94	3.03
c. Enhanced information, advice and guidance	31	58	1.87
d. A swift and straightforward process	32	88	2.75

Note: \*This table analysis responses from the 35 AB/HE sub-groups  
Source: York Consulting quantitative analysis, 2020

98. When we analysed the results for all 58 respondents, in addition to AB and HE providers, the findings were broadly in line with the above, but tended to have even less differentiation between the relative importance of the incentives.

### Question 10. Please provide any specific views on points a-e

99. Following the Question 10 ranking question<sup>7</sup>, respondents were provided with an open text box allowing them to provide any specific views on the incentives. There were 51 respondents that provided open text responses to this question. The relatively small differences shown in the ranking question (especially when responses from non-AB/HE sub-groups were included) were reflected here, with substantial numbers of respondents stating that all the incentives were important.

*"All of the above are equally important. The qualifications will not work without labour market relevance and student awareness but institutions will require funding to ensure that staff have relevant industrial experience and knowledge, the purchase of industry standard equipment. A swift and straightforward process is equally required as employers don't want to wait*

<sup>6</sup> One of the options (other) was not analysed as not enough respondents replied and it would imbalance the ranking analysis. Therefore, only 4 options were ranked.

<sup>7</sup> This analysis covers all 58 respondents that replied to the question.

*18-24 months for a qualification to be offered. Recognition by professional bodies and HEIs to guarantee progression routes.” Provider (FE)*

### **General comments on importance of incentives (28 references)**

100. General points raised on the importance of incentives largely focused on respondents’ assertions that **all four specified incentives were equally important** and, in many cases “*essential*”. It was felt that they should be considered as a suite, made to work together and delivered coherently and effectively to “*ensure a high-quality framework of diverse qualifications that meet learner and employer demand, and are relevant to local contexts*” (Professional/business organisation).

101. Other general comments related to the need to create qualifications that support the needs of the market and ensure that skills in niche areas or in sectors that are failing to attract young people do not disappear. Respondents also raised the following general comments and/or concerns:

- Perceived underfunding has been a major barrier to growth of high-quality level 4 and 5 provision in recent years:
  - Further education needs to benefit from significant funding to build capacity and acquire high quality human and physical resource.
  - The case for public funding is perceived to be strong, with arguments that an injection of grant funding is needed to address current skill shortage challenges.
- It would be unfair for qualifications that fall outside of the Institute’s expertise, or which don’t link to an occupational standard, to be subject to different funding or incentives.
- Assurances are required that qualifications will allow for transitions into FE and HE, including through recognition from universities and professional bodies. This can give students confidence that HTQs will open up opportunities, not limit them.
- Employers may not have the funds to fully engage if the apprenticeship levy is not extended to include HTQs.

### **Clear mark of labour market relevance (40 references)**

102. The discussions around kitemarking largely related to the **value of qualifications having a recognised industry stamp of approval** to help raise the prestige and profile of HTQs and encourage enrolment. Respondents felt that industry recognition was essential and without it, take-up would be slow. It was deemed to be particularly important in areas or sectors where there is a gap in IAG for prospective students, provision is niche or where markets and professional bodies were small and less well-recognised.

103. Where it was felt to be less important, it was largely due to existing qualifications having already been quality assured by, developed in consultation with or recognised by industry stakeholders and bodies. In these areas, it was felt that high-quality, labour market-relevant

provision and strong networks between employers, professional bodies and providers had already been developed and an additional kitemark would not necessarily elevate this further.

*“The majority of successful existing qualifications in the professional and technical market are successful because they are viewed as high quality and relevant to the market in which they operate. Adding a badge or logo will not add significantly to a successful awarding body.”*

Professional/business organisation

*“We have ranked the clear mark of labour market relevance lower at this stage because of the links our members already have with industries, professional bodies and employers. The more ubiquitous the kitemark becomes with students and employers, the greater the incentive. It should be recognised that not only do existing qualifications provided by our members meet educational standards in the FHEQ [Framework for Higher Education Qualifications], many of them have been developed with employers and professional bodies and are reviewed on a regular basis with their input.”* Professional/business organisation

104. A number of respondents also discussed the **importance of future-proofing** and the need to avoid the concept of “*market relevance*” being too heavily focused on current skills need. Given that the approved qualifications should be tailored to market needs, taking into account their “*shelf-life*” and the need for transferability, it was felt that they need to be subject to regular, systematic review to ensure continued applicability. However, it was felt this review and “*re-approval*” process needs to be as dynamic as the skills evolve to avoid them becoming overly burdensome for providers and associated stakeholders.

*“[The Institute’s] processes for reviewing standards need to allow for emerging sectors and their skills needs, through the use of forward-looking labour market analysis, wide consultation with employers and the involvement of experts in their field.”* Provider (HE)

105. Other emerging themes regarding kitemarking included:

- Care needs to be taken to ensure a) HTQs are not positioned as “*alternatives*” or “*rivals*” to existing provision b) a two-tier system of kitemarked HTQs vs. non-kitemarked HTQs does not develop with the latter being perceived of as inferior:
  - Choice should not be reduced or other routes disincentivised.
  - The meaning of kitemarking should be clear and avoid market confusion.
  - Some innovative, relevant, but niche HTQs may not be submitted to the Institute. This does not mean they should be thought of as substandard.
- Stakeholders need to have the utmost confidence in the approval process. Here, respondents cited similar themes to those expressed at Question 8, including:

- The approval process should be completely streamlined and transparent.
- Panels need to have the right level of knowledge and expertise.
- Employer engagement needs to be continual to ensure sustained market currency.
- Panels should not be biased towards a number of influential employers and SME voices should be heard.
- PSRBs will have an important role to play in the kitemarking process to ensure industry relevance.

### Competitive funding package (43 references)

106. Generally, respondents agreed that **funding packages need to be carefully considered** and clarified to ensure attractiveness for providers and students. However, it was less clear in the open responses the degree to which this would act as an incentive to encourage the submission of qualifications for approval as most comments related to the importance of encouraging take-up.

107. A number of respondents felt that part of the reason for the significant decline in the level 4 and 5 routes, in addition to lack of promotion, had been funding complexities and lack of a compelling offer for potential learners.

108. Several references were made to developments in recent years in terms of the take-up of Advanced Learner Loans being lower than anticipated and the decline in level 4 and 5 mature and part-time learners. It was felt that the return on investment for learners to take out a loan at levels 3-6 was not sufficiently attractive, nor could it compete with the potential for employer sponsorship, and that this needs to be taken into consideration when designing funding packages.

109. Respondents argued that accessibility and widening participation should be the fundamental objectives of the available funding packages and that the following key aspects need to be considered:

- **HTQs should have same equivalency** in scale and status and funding to other qualifications.
- **Funding criteria should be based on a strong evidence base:**
  - In areas where skill gaps are identified it might be appropriate to provide greater funding to stimulate provision and a strong offer.
  - Students that need flexible provision should be better supported.
  - Learners should have access to qualifications that support skill development and encourage social mobility.
- **Provision should be made for part-time and adult learners:**
  - Higher proportions of level 4 and 5 learners are already in the workplace and are using them to upskill or move into a specialised area of work.
  - Differential support is a concern for them with regards to maintenance loans (which are not always available for part-time students).

- **The system for taking out loans should be as streamlined as possible**, with clear advice and guidance available for providers, ABs and potential students.

### Enhanced support for potential students through IAG (54 references)

110. There was a general **consensus that IAG was extremely important**, with a number of respondents arguing that there needs to be a significant revival of IAG services in the UK.

111. However, it was not necessarily considered to be a driver for qualification submission to the Institute. Further, it was argued that it should be extended to HTE provision in general, not just new qualifications, due to the current low awareness, profile and recognition of HTE options.

112. Raising the profile of this type of provision from school onwards, communicating clear career pathways and channelling information through employers were the three key themes emerging from discussions around IAG.

113. A number of references were made to the need to start providing influential information on these learning pathways at school. Raising awareness, building confidence in HTQs and encouraging students and parents to perceive them as credible alternatives, though challenging, was deemed essential to their success.

114. As well as starting this process early, it was felt vitally important that learners have a clear understanding of the labour market options available to them when selecting qualifications. Using data, evidence and recommendations from employers and advice on the future job market, including the potential impact of automation, would help persuade learners to engage. Filtering knowledge on the future skills requirements for learners was thought to be essential in helping them make decisions regarding their career trajectories.

*“Enhanced IAG is a natural component of a more market-responsive skills offer. Learners must have a clear understanding of the professional and technical roles that will be available after their qualification so that the system can maximise progression and job entry rates. ‘Right learner, right course’ is critical to making the new system work and secure the buy-in of industry.”* Provider (FE)

### A swift and straightforward process for submission, appraisal and decision making (27 references)

115. There was strong agreement that a **streamlined submission process is advantageous**. However, it was felt by several respondents that this should just be a fundamental part of the process, rather than an *“incentive”* per se.

116. There is a general desire amongst employers to have a more rapid response to their training needs due to the demands of an increasingly dynamic labour market. Whereas it is perhaps unrealistic to rely on HTE provision solely to meet those demands, it was felt that the

aim should be to create a skills system which is more agile and adept at responding to continuous change, with the approval process not hindering this.

117. Respondents wanted assurances that appropriate resources and expertise would be available to carry out the approval process efficiently. Several references were made to not wanting to see a repeat of recent history, notably the perceived apprenticeship standards approval delays, which have been frustrating for providers and employers. There is a sense that there is currently a lack of confidence in the Institute's level of understanding and expertise in this area to deliver a streamlined process.

*"We are concerned about the capacity of [the Institute] to deliver a streamlined process given their relative lack of experience in this type of provision, ongoing commitments in T Levels and apprenticeship standards reform, and the expertise needed for specialist qualifications. Initial piloting could help rectify any early problems, increase trust and therefore support demand for submission from higher education providers. Where [the Institute] lacks experience (for example in classroom-based qualifications) it should draw on outside expertise as required."* Provider (HE)

### **Other incentives proposed (25 references)**

118. In addition to the incentives outlined, a number of suggestions were made for other incentives that may encourage qualifications to be submitted:

- Student access to a free, independent complaints system which helps improve student experience and provides reassurance that they will be supported should anything go wrong.
- Upfront support / premiums e.g. teaching grants, student bursaries, extra funding for providers of courses leading to HTQs.
- Support for providers in aiding any qualification and accreditation transitions.
- Kitemarks that are internationally recognised.
- A long-term, sustained national marketing campaign to raise profile and prestige, spearheaded by key senior government figures.
- Incentives to develop new programmes, concentrated in sectors and geographical areas where educational engagement is at its lowest (e.g. rural, coastal and northern regions).
- A searchable register or database of regulated qualifications that is independently quality assured.

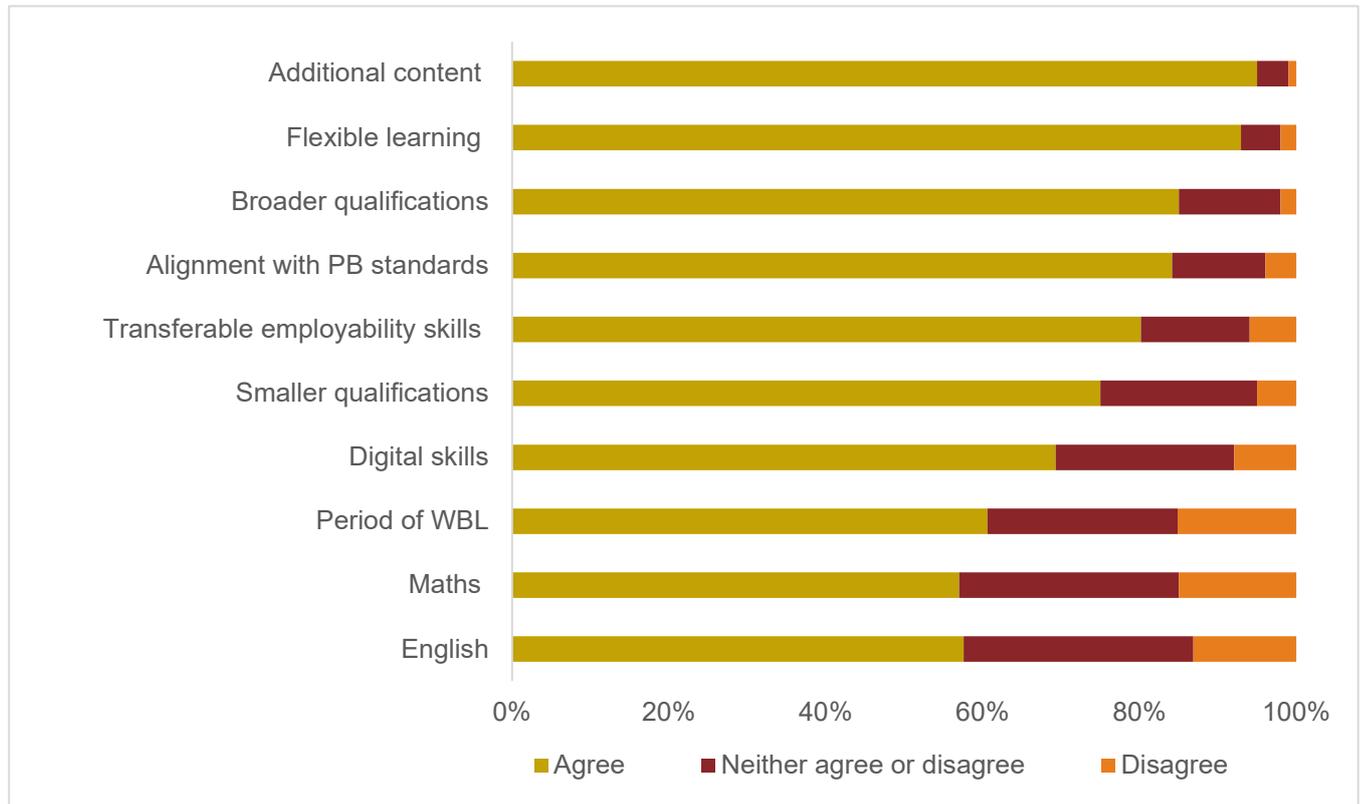
### **Question 11. Would you support incorporating the following flexibilities/requirements in the Institute approval process?**

119. DfE's intention is to establish an opt-in system for qualification approval. ABs will be able to choose whether to submit their qualifications for Institute approval against a standard, with clear incentives to do so. The approval of qualifications against the knowledge, skills and

behaviours in a single occupational standard is the core model. However, respondents were also asked about the potential for incorporating additional flexibilities/requirements in a range of areas.

120. **The highest levels of agreement were for allowing additional content and supporting flexible learning** (Figure 4). There was less agreement around work-place learning and flexibilities around English and maths.

**Figure 4: Question 11 summary**



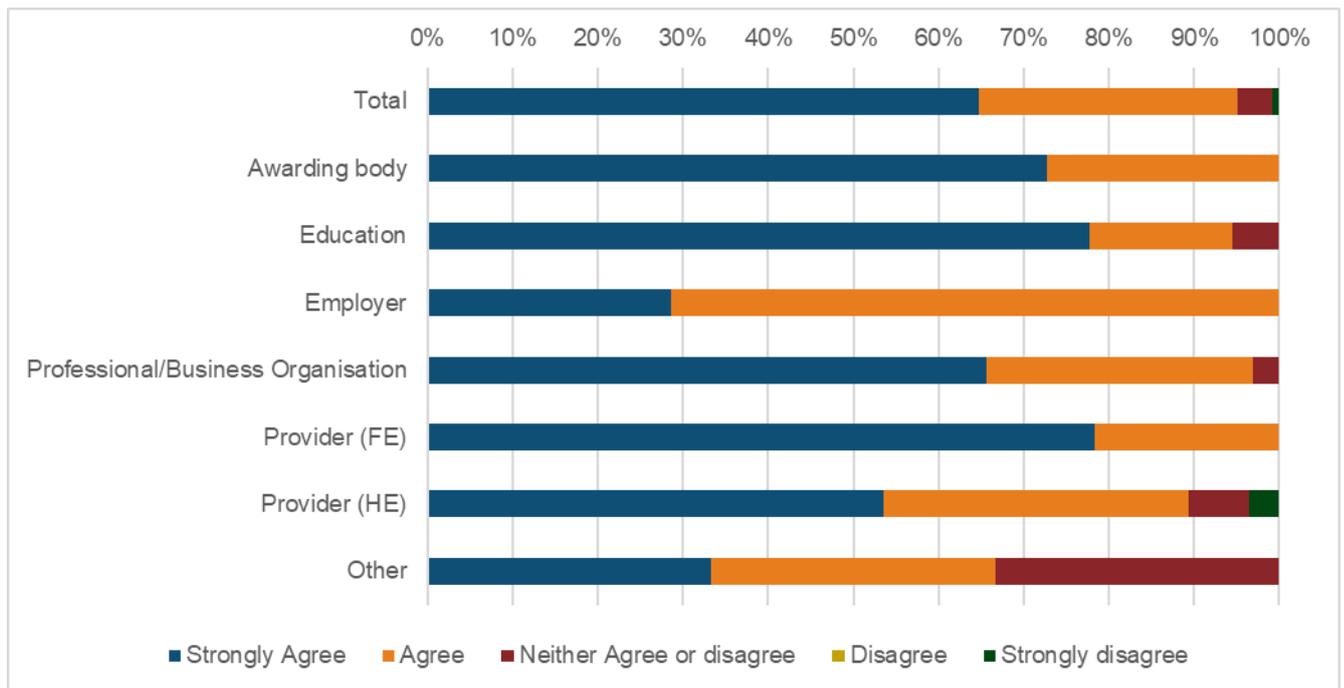
Source: York Consulting quantitative analysis, 2020

121. We now consider each of the flexibilities in turn.

**Question 11a. Would you support incorporating the following flexibilities/requirements in the Institute approval process. a. Flexibility to include additional content.**

122. **Flexibility to include additional content:** it may be beneficial for ABs to include a certain amount of occupationally-relevant content in a qualification, which is not aligned to occupational standards. This could respond to specific local and sectoral skills needs or reflect innovative or emerging practices.

**Figure 5: Question 11a. (n=122 responses)**



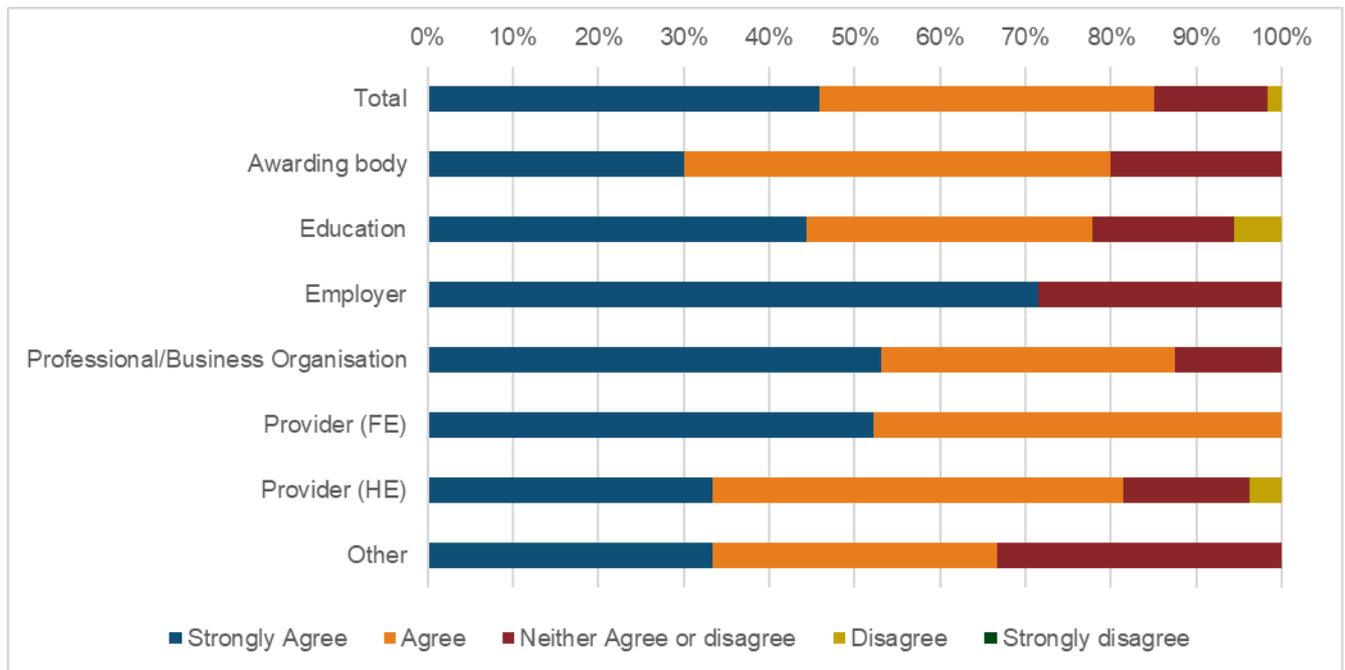
Source: York Consulting quantitative analysis, 2020

123. There were 122 respondents to Question 11a (91% of all respondents). Figure 5 shows a large majority (95%) agreed that there should be flexibilities/requirements in the approval process to incorporate additional content. Almost two out of three in the cohort responded, 'strongly agree' (65%). Only one from the cohort disagreed that new HTQ's should include additional content, this being a HE provider.

## Question 11b. Would you support incorporating the following flexibilities/requirements in the Institute approval process. b. broader qualifications

124. **Broader qualifications:** whether there is business need for qualifications to be able to cover the knowledge, skills and behaviours in more than one occupational standard.

**Figure 6: Question 11b. (n=120 responses)**



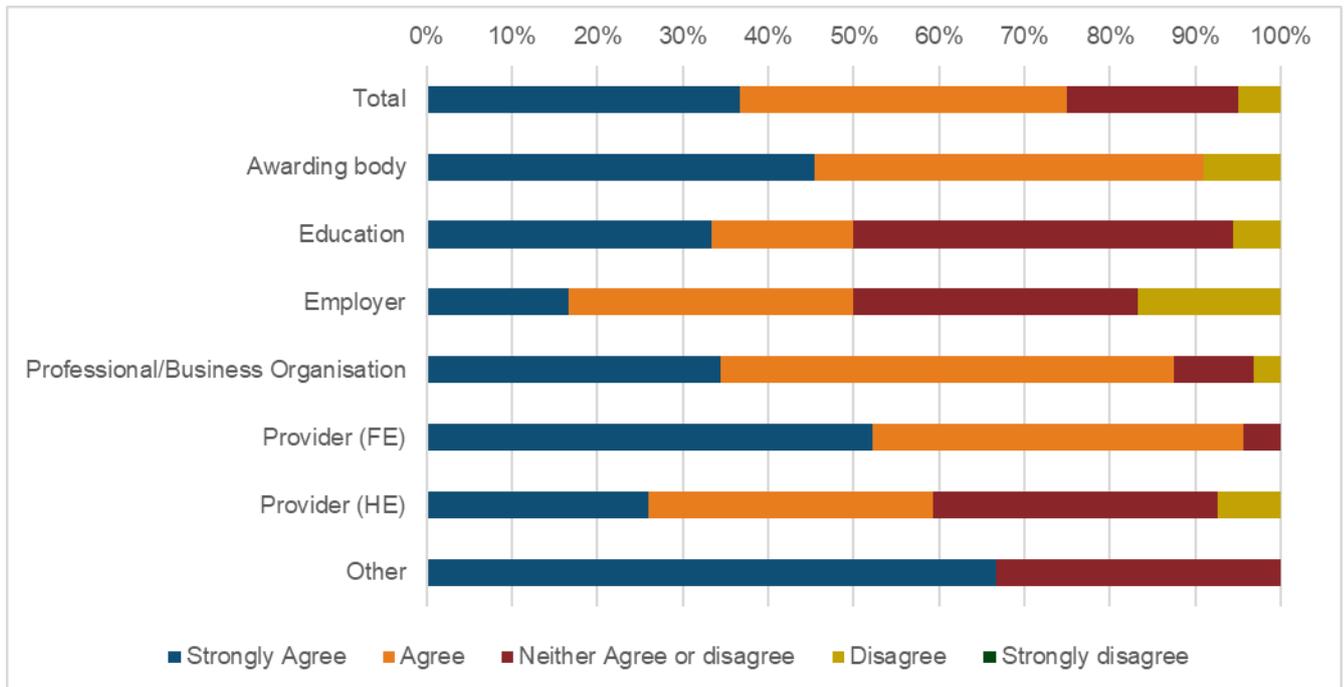
Source: York Consulting quantitative analysis, 2020

125. There were 120 respondents to Question 11b (90% of all respondents). Figure 6 shows that over four out of five (85%) agreed that there should be flexibilities/requirements in the approval process to incorporate broader qualifications. In all sub-types over half of respondents agreed there should be broader qualifications. The most frequent response from the cohort was 'strongly agree' (46%).

## Question 11c. Would you support incorporating the following flexibilities/requirements in the Institute approval process. c. Smaller qualifications

126. **Smaller qualifications:** whether there is value in Institute approval of smaller, more specialised awards that might cover some, but not all, of the knowledge, skills and behaviours in a relevant occupation.

**Figure 7: Question 11c. (n=120 responses)**



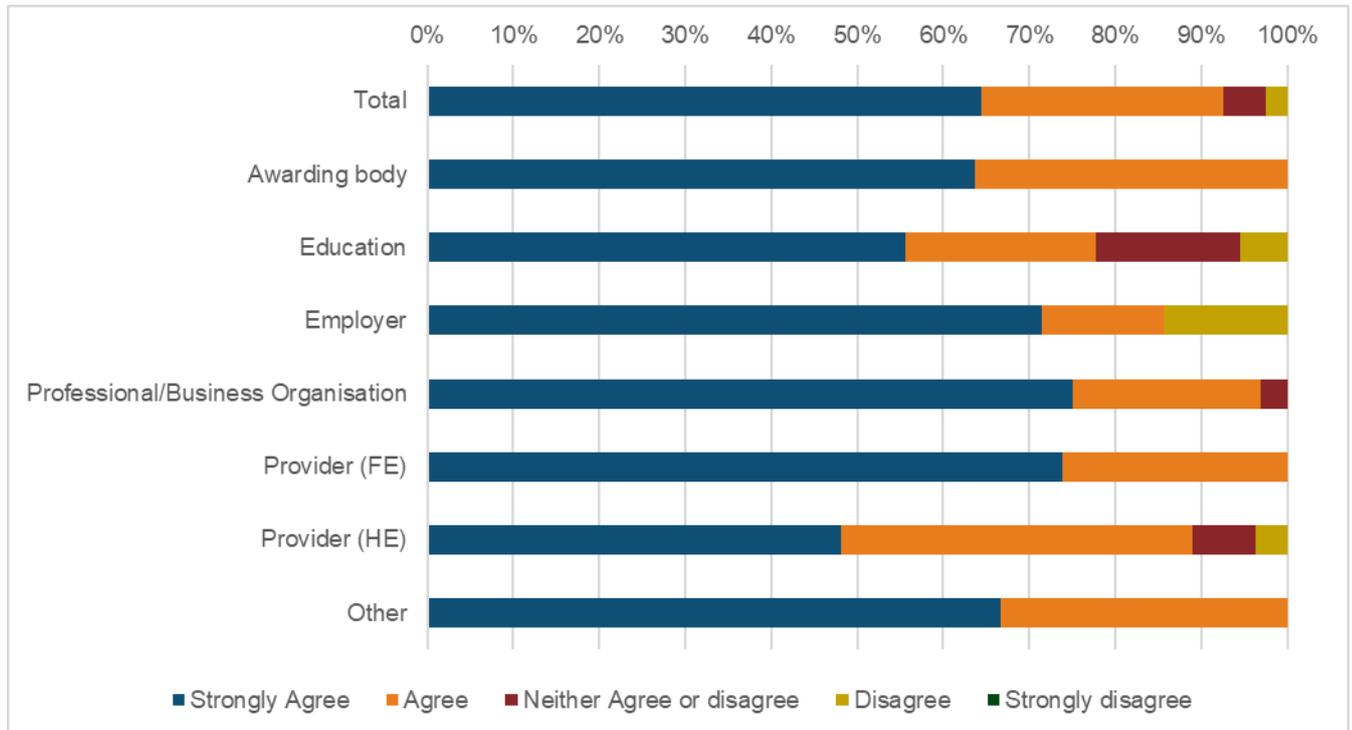
Source: York Consulting quantitative analysis, 2020

127. Identically to Question 11b, there were 120 respondents to Question 11c (90% of all respondents). Figure 7 shows that that three-quarters (75%) agreed that there should be flexibilities/requirements in the approval process to incorporate smaller qualifications. A significant amount responded with 'neither agree or disagree' (20%). A good proportion of these responses came from the sub-types 'education' (eight out of 18) and 'provider (HE)' (nine out of 29).

## Question 11d. Would you support incorporating the following flexibilities/requirements in the Institute approval process. d. Flexible learning

128. **Flexible learning:** whether and how modules or smaller qualifications should be approved by the Institute to allow students, especially adults, to step on and off their course.

**Figure 8: Question 11d. (n=121 responses)**

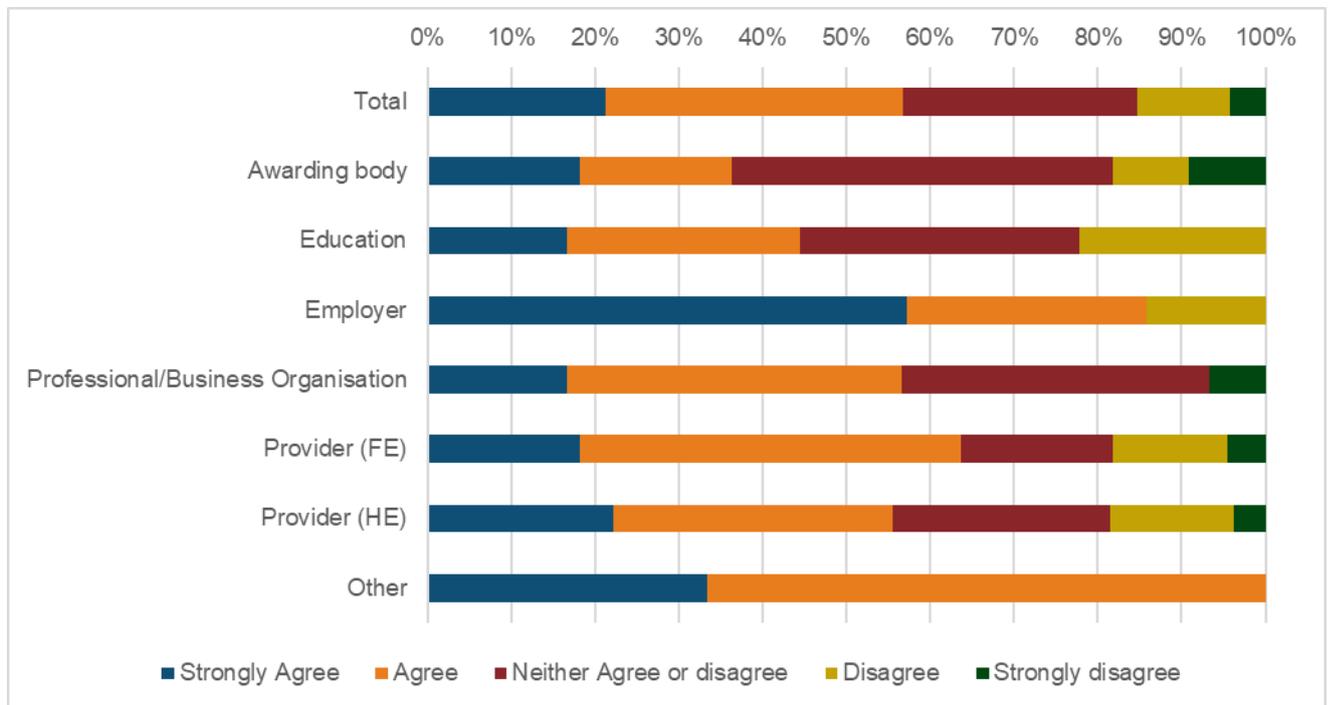


Source: York Consulting quantitative analysis, 2020

129. The number of respondents to this question was 121 (90% of all respondents). Figure 8 shows that over nine out of ten (92%) respondents agreed that there should be flexibilities/requirements in the approval process to incorporate flexibility of learning, including additional flexibility for adults to step on and off their course. Almost two out of three responded with 'strongly agree' (64%).

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(i) Other requirements: Maths**

**Figure 9: Question 11e (i). (n=118 responses)**

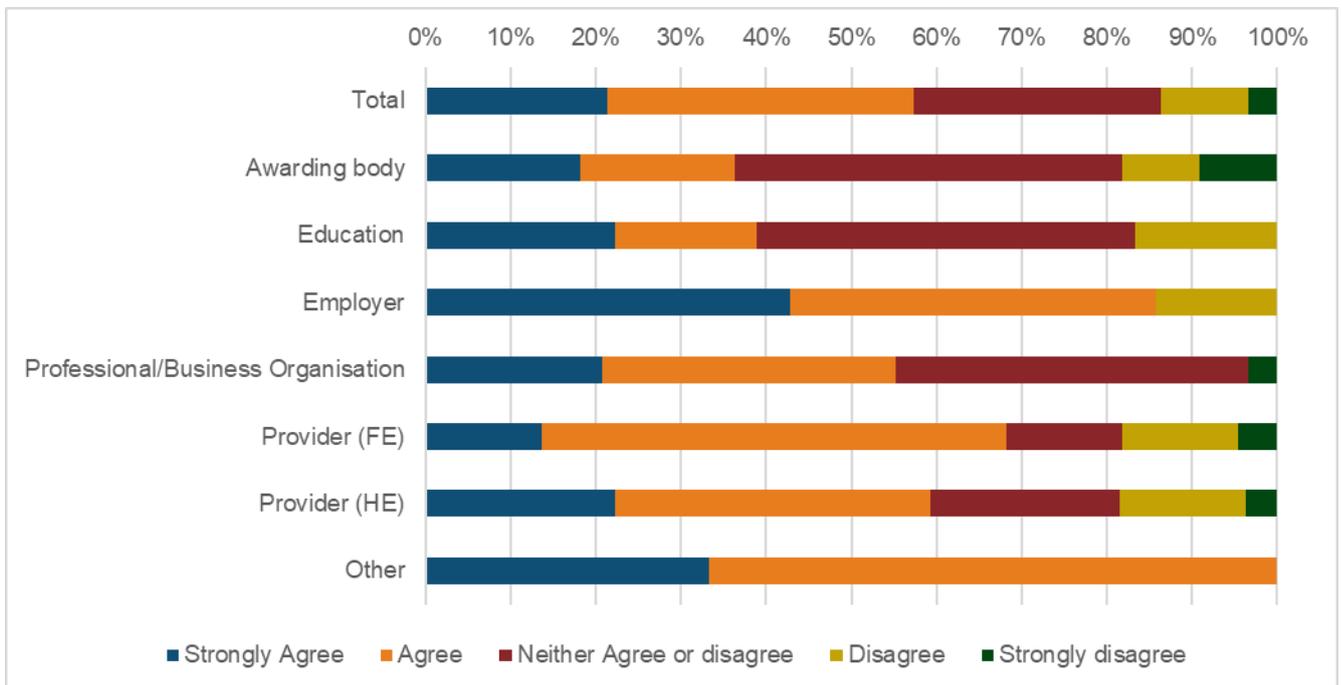


Source: York Consulting quantitative analysis, 2020

130. The number of respondents to this question was 118 (88% of all respondents). Figure 9 shows that over half of the cohort agreed that there should be flexibilities/requirements in the approval process to incorporate **proficiency in maths** (57%). More than one in four responded stating they 'Neither agree or disagree' and 15% disagreed.

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(ii) Other requirements: English**

**Figure 10: Question 11e (ii). (n=117 responses)**

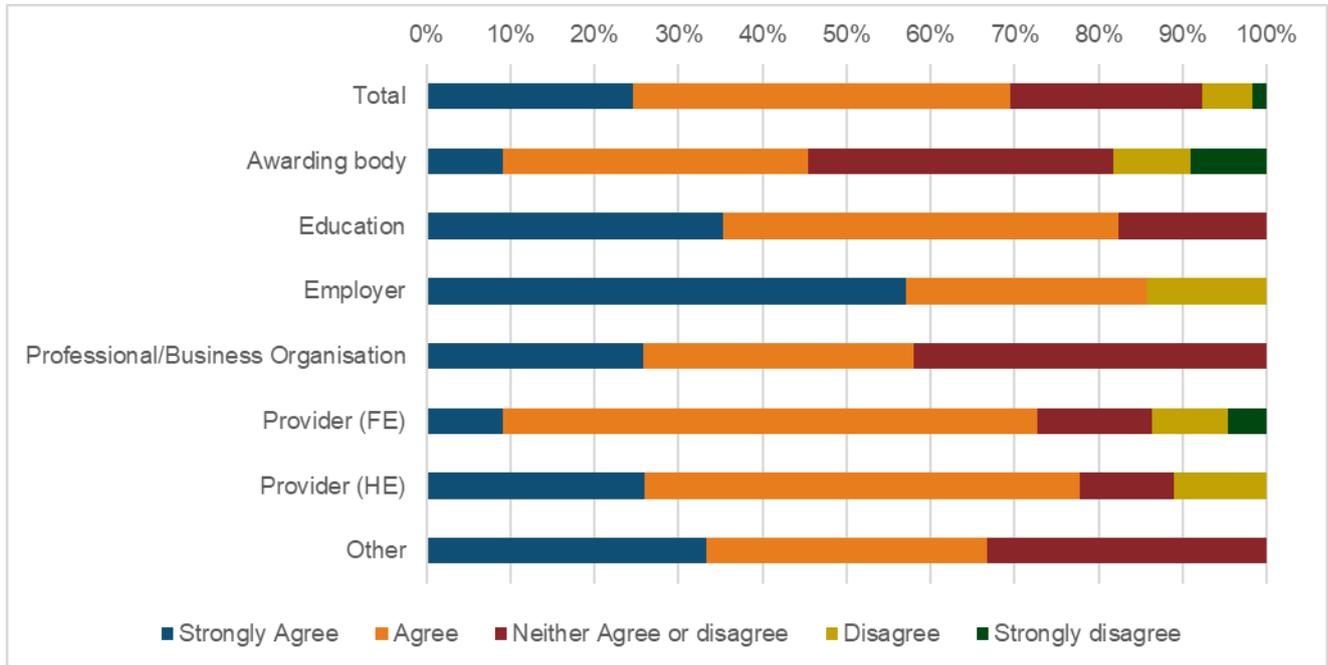


Source: York Consulting quantitative analysis, 2020

131. The number of respondents to this question was 117 (87% of all respondents). Almost identically to the maths results in Figure 9, Figure 10 shows that 57% agreed with incorporating **proficiency in English** and 29% responded 'Neither agree or disagree' to this proposal.

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(iii) Other requirements: Digital skills**

**Figure 11: Question 11e (iii). (n=118 responses)**

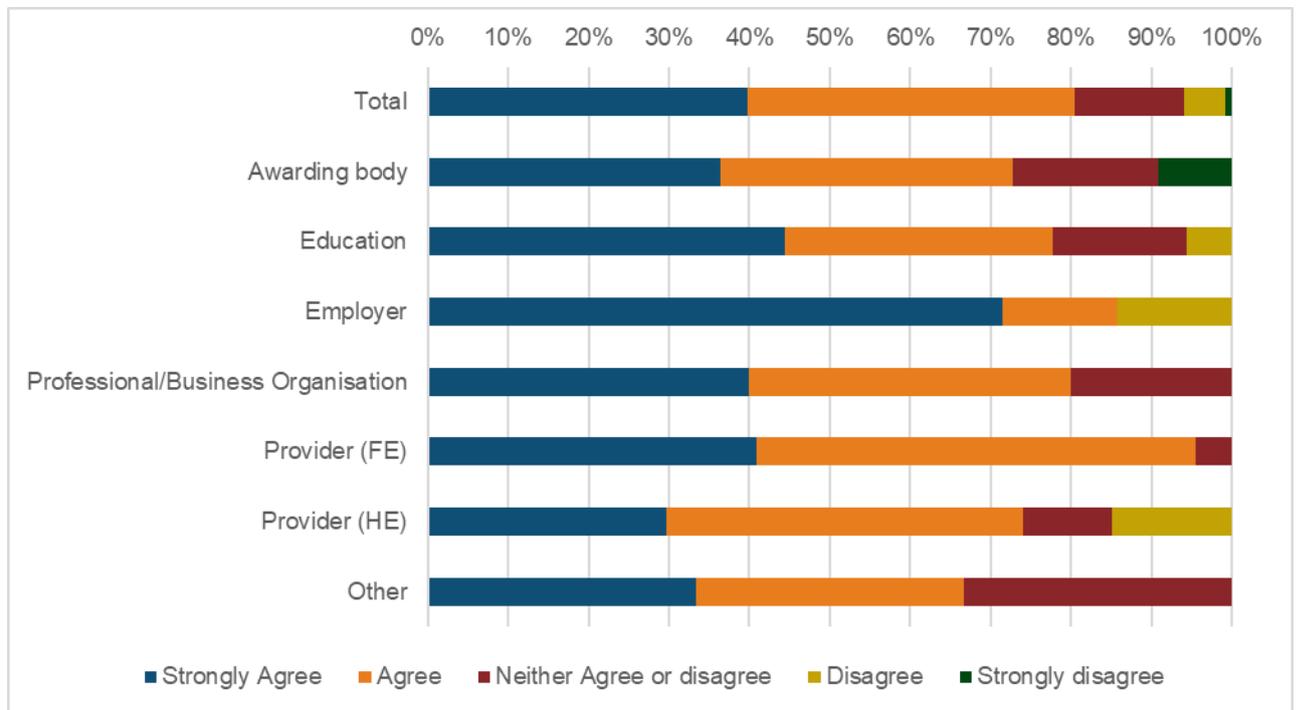


Source: York Consulting quantitative analysis, 2020

132. 118 respondents responded to this question (88% of all respondents). Figure 11 shows that over two-thirds of respondents (70%) agreed that there should be flexibilities/requirements in the approval process to incorporate **proficiency in digital skills**. This shows that there was a higher level of agreement from respondents towards proficiency in digital skills, rather than maths or English as represented in Figures 9 and 10.

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(iv) Other essential transferable and employability skills**

**Figure 12: Question 11e (iv). (n=118 responses)**



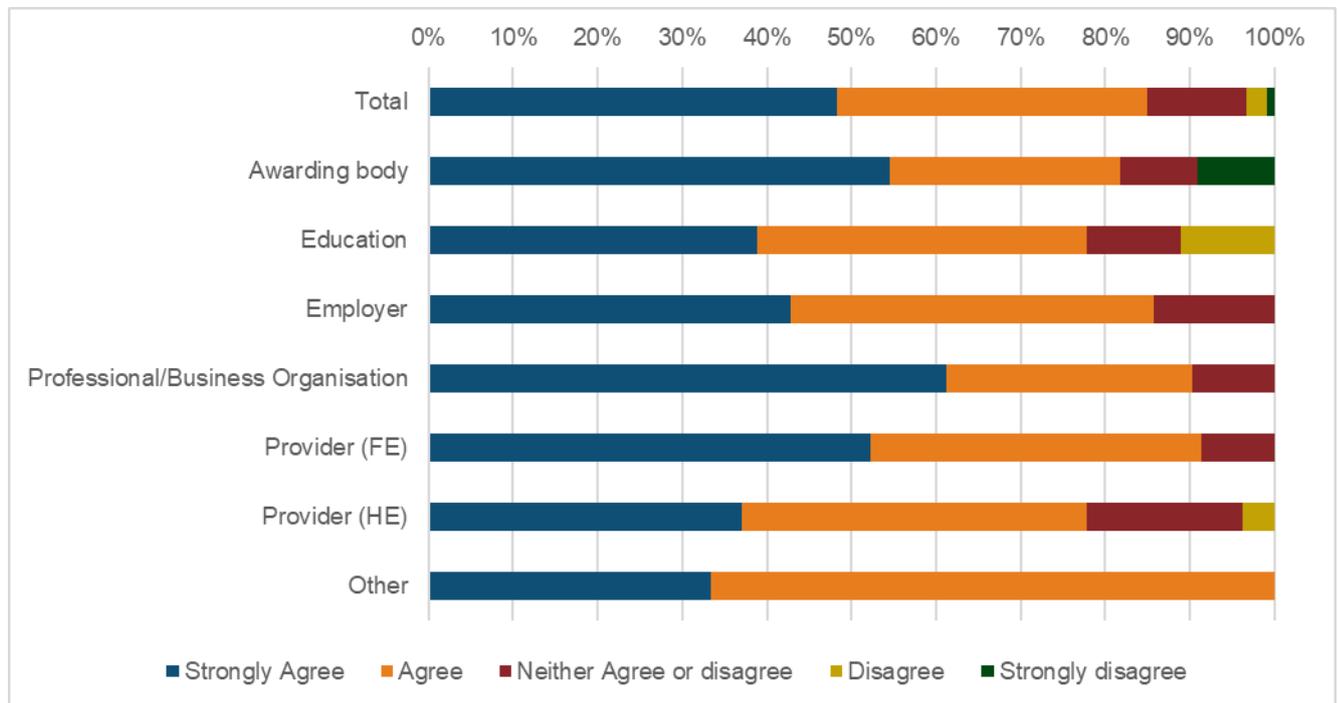
Source: York Consulting quantitative analysis, 2020

133. As in the previous question, there were 118 respondents to this question (88% of all respondents). Figure 12 shows that there was a higher level of agreement to incorporating **proficiency in other essential transferable and employability skills** (81%). Responses were evenly split between ‘strongly agree’ (40%) and ‘agree’ (41%).

134. Nearly all Employers (6 out of 7) and Providers (FE) (21 out of 22) agreed with this proposal. It is not unexpected that employers would prefer HTQ learners to develop transferable employability skills through the qualification and not later when in employment.

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(v) Alignment with professional body standards**

**Figure 13: Question 11e (v). (n=120 responses)**

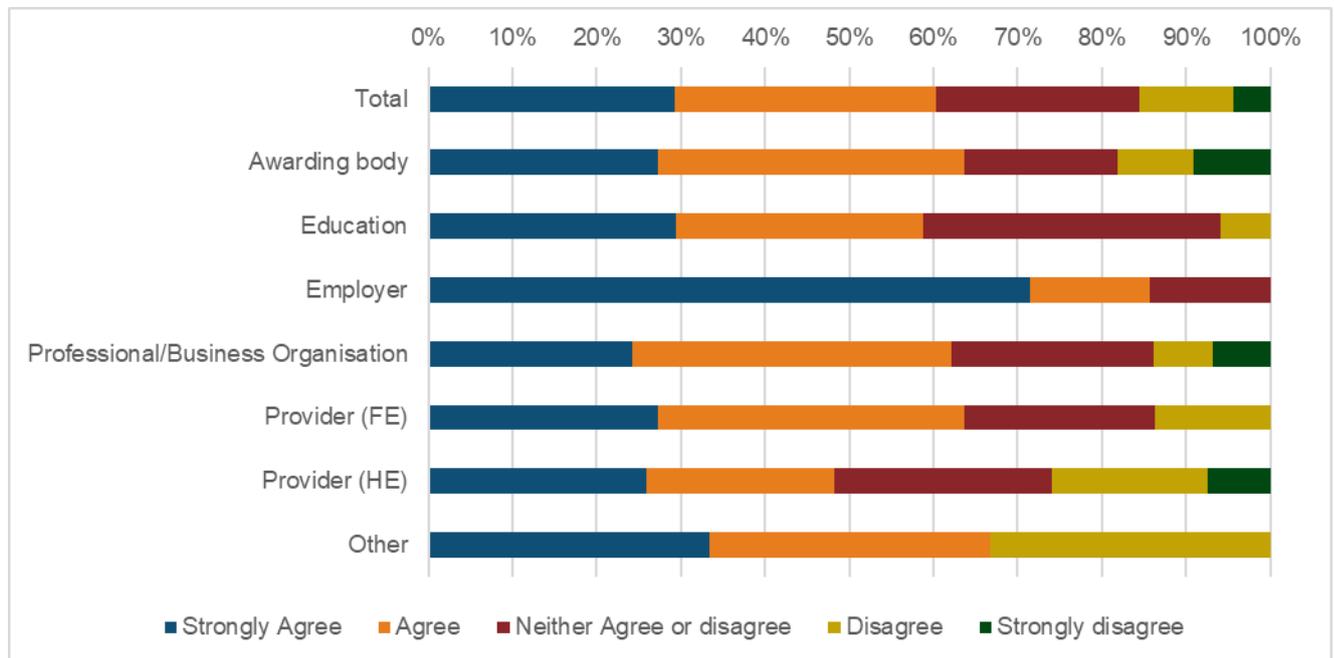


Source: York Consulting quantitative analysis, 2020

135. The number of respondents to this question was 120 (90% of all respondents). Figure 13 shows that 85% of the cohort agreed that there should be flexibilities/requirements in the approval process to incorporate **alignment with professional body standards**. This is the highest proportion that agreed for any of Question 11e’s additional requirements.

**Question 11e. Would you support incorporating the following flexibilities/requirements in the Institute approval process. e.(vi) A period of work-based learning**

**Figure 14: Question 11e (vi). (n=116 responses)**



Source: York Consulting quantitative analysis, 2020

136. There were 116 respondents that responded to this question (87% of all respondents). Figure 14 shows that 60% of respondents agreed that there should be flexibilities/requirements in the approval process to incorporate **a period of work-based learning**. 24% of the cohort responded, 'Neither agree or disagree' and 15% disagreed.

**Question 11e. Summary of (i) to (vi)**

137. Of the six other flexibilities/requirements, the key points are:

- The additional flexibilities/requirements with the highest proportion of respondents that agreed are; 'Alignment with professional body standards' (85%) and 'Other essential transferable and employability skills' (81%).
- There was lower agreement regarding 'Digital skills' (70%), 'Maths' (57%) and 'English' (57%).

## Question 11 Open. Are there any specific points you would like to raise in relation to points a-e?

138. There was **strong support for bringing flexibility in to the HTQ process and programme design, structure and content**. For some, flexibility was thought necessary to ensure attractiveness to the sector, encourage take-up amongst target groups and to optimise the opportunities for building creativity, innovation and agility into the skills system. Furthermore, it was argued that there was a need to ensure learners develop broad skill sets that will equip them with the appropriate knowledge for career longevity, rather than focusing only on competencies need required for a specific job.

139. Respondents felt that some of the most successful independent HTQs integrate a multi-disciplinary approach which reflects not only the main occupational route but further career opportunities for students.

140. A key argument made for supporting a flexible approach was the importance of a system that can respond to the differing needs of employer types and sizes, innovative practices and local and sectoral needs. Regional relevance was argued to be paramount to HTQs to ensure they are meeting employer requirements, filling appropriate skills gaps and adhering to regional industry and skills strategies.

141. However, there was a degree of caution concerning how flexibilities are built in and it was believed by some that caution needs to be taken to ensure that quality is not compromised and that the kitemark, if adopted, does not lose its meaning and significance. In addition, it was queried how equivalence will be ensured and how the flexible approach proposed will operate in relation to funding.

*“If Awarding Bodies and HEIs are asked to develop qualifications to employer standards thought needs to be given as to how this might influence the size and shape of qualifications - one organisation might develop a very small qualification that focuses narrowly on the standard (possibly to the detriment of students’ personal and educational development via the development of transferable skills routinely identified by employers as their key ask) where another may see value in developing with a range of flexibilities - how will parity be achieved and how will this relate to funding?”* Awarding body

142. Although in the minority, a number raised concerns about the flexible approach and believed that courses should be well-defined and standardised with limited flexibility so as not to dilute delivery. It was argued that otherwise there was a risk of programmes being developed that did not supply learners with the prerequisite technical/practical skills required. Furthermore, standardisation ensures that employers can feel confident in what qualifications certify, regardless of where the qualification was provided.

143. The following comments were made about building in flexibilities in general:

- Flexibility provides an opportunity to build in less traditional learning methods e.g. blended learning and online forums.
- Where flexibility is applied, it must form part of a clear structure and branding system so that learners and employers are fully aware of why the alternative approach has been adopted.
- Qualifications should not tie graduates too closely to a specific occupation.
- Linking an HTQ to an occupational cluster will ensure more varied progression opportunities.
- Trailblazer groups need to be supported to work quickly to ensure responsiveness to rapid changes.
- A degree of sector-relevant tailoring is required with assessment approaches to ensure that it meets the needs of learners and employers.
- Proficiency in and knowledge of employability and digital skills should be required as part of HTQs.
- There is an opportunity to embed entrepreneurship in HTQs to equip those looking for self-employment and business start-ups.
- There could be minimum level / credit boundaries for qualifications to ensure parity across the sector.
- It would be useful to have clarification on how the approvals process will work if a need is identified for a qualification that applies to more than one standard.

### **Flexible learning and smaller modules**

144. The proposals were felt to be **advantageous in encouraging lifelong learning, ongoing personal and professional development, upskilling and ultimately, social mobility**. There was strong advocacy for adults already in the workplace stepping back into learning and a modular approach and smaller qualifications was thought to be a way of achieving this. Module based learning or smaller qualifications would enable providers to design specialised delivery that allows experienced people in industry to update their knowledge or move across sectors into related occupations, as well as allowing employers to fill skills gaps. In many cases, the type of learning suits being broken into bite-size units that enable learners to learn at their own pace, potentially learning smaller qualifications at different providers and claiming the overall qualification from the AB.

*“Flexibility in allowing learners to access qualifications in different modes and timeframes will be very important for adult learners. We think this is an important aspect of current level 4 and 5 qualifications and we hope that this will continue to be the case.”* Awarding body

145. However, some argued that careful consideration needed to be taken as to how to ensure that complexities are not introduced to the system as a by-product of this and that learners are clear what qualifications offer and what the subsequent future opportunities are.

### Perceptions on work-place learning

146. **Perceptions were more varied concerning workplace learning** and there were several requests for clarification on how this would work in practice. Work-place learning was considered advantageous in exposing learners to hands-on, industry-based learning and to enabling them to build networks.

147. However, it was felt that a degree of caution needed to be taken and careful consideration given to how this component would be structured and operate. Clarification was required on how placements would be facilitated. It was argued that placements can be difficult to find and require ongoing employer engagement. Concerns were raised about the degree to which this would be burdensome for providers and employers, resulting in them disengaging from HTE.

148. Some argued that placements should not be mandatory and that thought needed to be given as to how HTQ work placements would fit with other work-based technical education requirements. For example, there is already concern regarding the alignment of extended work placements within T levels against apprenticeships and the risks that T levels will undermine apprenticeships as a “free labour” offer.

*“Employers are being expected to enable a raft of work engagements with learners covering work experience from school, traineeships, apprenticeships, study programmes, internships, and local return to work initiatives etc. What we must be mindful of is that employer fatigue doesn’t appear resulting in less opportunities to engage. Other than apprenticeships the other programmes are a cost to the employer for perhaps little if any ROI or immediate improvement in productivity.”*

Awarding body

149. It was also argued that many HTQ learners will already be in work and that mandated work-based learning could potentially be a barrier for part-time, employed learners and/or those with caring responsibilities, particularly where they are required to travel long distances.

150. Some argued that the need for work placements and their duration should be assessed on an individual case by case basis and not be a blanket requirement across HTE. Some industries may benefit from longer placements with one employer, others from shorter placements from a number of different employers.

151. Several clarification points were sought:

- Whether workplace learning would be embedded within HTQs or sit outside.
- How work-based learning would guarantee learning in line with the required standard.

- Responsibilities for facilitation and quality assurance.
- What would happen if a provider or learner is unable to access workplace learning.

### **Alignment with professional body standards**

152. **Aligning qualifications with professional standards was thought to be valuable** as it provides a well-recognised benchmark for industry. In addition, in some sectors it was considered vital to ensure safe and successful working practices.

153. Nevertheless, it was believed that further thought needs to be given on how alignment between professional body standards and occupational standards will be achieved and how this affects more specialised qualifications that will not cover professional standards in their entirety.

### **Proficiency in other areas**

154. Views varied around the need for proficiency in English, maths and digital skills and further exploration in this area is potentially required. Further clarity was needed as to whether they would be a required component within the HTQ, assessed separately, or be an admissions requirement.

155. On the one hand, respondents argued that basic skills in these areas were essential and necessary to employers and so should be fundamental to HTQs. Indeed, some argued that a certain level of proficiency in these areas should be an entry requirement.

156. On the other hand, concerns were raised about the impact on widening access if these proficiencies took the form of compulsory entry conditions, rather than being assessed as outcomes built into qualification content.

157. A set of core transferrable skills were seen to be key to employability and to help students prepare for long-term career pathways. Business, enterprise and finance skills were thought to be highly valuable in encouraging creativity, innovation and in opening additional opportunities to graduates.

### **Question 12. Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements?**

158. In total 93 respondents provided text responses to Question 12. Largely comments related to ensuring that regulatory arrangements were not unnecessarily confusing or complex and that roles and responsibilities of different regulatory bodies were clear so as not to avoid duplication. Although the majority agreed that the existing regulatory arrangements should be kept, some agreed with reservations and these were outlined in open comments.

## General comments on retaining the regulatory arrangement (30 references)

159. A number of **general comments were made in support for retaining the regulatory arrangement**. Reasons that this was thought to be appropriate included:

- As an established system, it is known and understood by stakeholders and therefore elicits confidence.
- Consistent and efficient regulatory accountability is essential, with the same principles being applied to HE provision and higher apprenticeships.
- It would avoid duplication and overly burdening providers, but it is important to ensure that the two systems are aligned.
- It is essential to ensure that HTQs meet the required academic standards expected by students and employers.
- It aligns with recommendations from the Augar review that OfS should become the regulator of all non-apprenticeship provision at levels 4 and above.

## Harmonising and streamlining regulatory arrangements (42 references)

160. Several comments referred to the **existing regulatory framework as being confusing and over-complicated** due to the number of different bodies and government agencies involved and the varying quality assurance levels. Concerns were raised that having further additional tiers or a different set of procedures for the HTE approval process would be burdensome for providers, add complexity to an already difficult to navigate system and discourage take-up. A different set of procedures, criteria, funding regulations and oversight mechanisms for HTQs has potential to create even more confusion within the skills agenda.

161. It was therefore felt that it would sensible to at least maintain the existing arrangements to avoid further complication. Some respondents went further, believing that it would be an opportune time to explore the potential for further streamlining. There was some concern that the regulatory bodies do not work as efficiently, collaboratively or transparently as they might, leading to the duplication of roles and confusion over how qualifications are quality assured. Further, there were also concerns that an inefficient system could result in delays for getting qualifications approved.

*“It is essential that duplication in the roles of Ofqual, OfS and the Institute are avoided. There is no need for another organisation to regulate HEIs other than OfS, indeed Ministers have made a commitment to avoid duplication and minimise the bureaucratic burden on HEIs.”* Provider (HE)

*“With requirements coming from a multitude of different regulatory bodies in the sector including the DfE, Ofqual, Education and Skills Funding Agency (ESFA), the Institute, OfS and more, we recommend that existing regulatory arrangements are maintained, refined, and simplified, rather than enhanced as this would stifle the sector.”* Provider (FE)

## Concerns raised over Ofqual and/or OfS's involvement (19 references)

162. **Generally, concerns were driven by the perception that the regulatory framework was already burdensome** and/or costly for some stakeholders and by keeping the status quo, little was being done to challenge this or simplify the system. Specific issues were raised around needing reassurances on the following:

- Registration processes and associated fees not being prohibitive to smaller providers who offer high quality HTEs that meet specific sector needs.
- The impact of OfS (as a potential barrier to registration) on the parity of finance available to learners at different providers, social mobility and skills needs.
- How the Institute, Ofqual and OfS will develop a coherent, robust system that effectively uses existing quality assurance levers within the technical education environment.
- Appropriate resources being put in place to support shifts in regulatory responsibility from Ofqual to OfS.
- OfS's capacity to deliver timely approval due to recent expansions in its remit.

163. Furthermore, a number of respondents expressed a lack of confidence in Ofqual and/or the OfS as appropriate organisations to be associated with HTQs. In the case of the former, this was due to the belief that its continued endorsement and prioritisation of A Levels and GCSEs has driven the demise of technical subjects in schools and the stifling of employer needs and development of skills required for future markets. It was also felt, particularly in the case of universities, that its involvement was unnecessary, given that registration with OfS is a confirmation of quality of provision.

164. In OfS's case, there was a concern that its involvement could result in qualifications becoming predominately academic in nature and under the control of universities, while technical delivery and training at levels 4 and 5 is typically undertaken by Colleges and private providers. In addition, respondents felt that engagement with the OfS had proven to be difficult for Colleges in the past.

165. The lack of confidence in the organisations' technical experience and expertise was also raised as a concern, particularly with regards to their ability to assess the competence and quality of course deliverers.

*"Given the combination of academic and industrial expertise inherent to engineering technical qualifications, they present unique challenges not faced by OfS or Ofqual in their current regulatory roles. That said, we recognise that OfS has an important role in protecting the interests of learners."* Professional/business organisation

## Ensuring the technical need is met (15 references)

166. In addition to discussions about the regulatory bodies, a number of points were raised about the importance of professional bodies existing and future input into the approvals

process. **Respondents were keen to state that there are many good examples of providers, employers and Professional Bodies collaborating in the development, approval and accreditation of HTQs.** Where providers are already complying with high technical standards from professional bodies or industry standard programmes it was felt that regulatory bodies should not duplicate efforts, but rather work alongside them to streamline quality and auditing processes to avoid unnecessary costs.

167. The involvement of professional bodies and industry was thought important in ensuring that employers and students have confidence in the quality of qualifications, but also that experiences from a wide-range of employers (including 'harder to reach' SMEs) are captured and considered.

168. In some cases, it was felt that a broader approach than the existing framework should be adopted to meet the technical need. It was argued that the approach to regulation has been stifling in the past and limiting to certain providers *"given the strong disposition in Ofqual towards quality and corporate models of publicly funded providers"* and that its heavy focus on academia has provided little scope to explore vocational approaches.

## Feedback from the consultation events

169. There was a consensus in the consultation responses that for HTQs to be a success, they needed to be reflective of local employer needs, driven by current and future skills demand. Attendees also emphasised the importance of employer representation in the process being representative and diverse and not dominated by large employers.

170. As with the online and email responses, concerns were raised regarding the focus on occupational standards and the potential that resulting qualifications could be too narrow, failing to provide the wider skills that employers value if they were driven by these alone.

171. Questions were also raised about the Institute's involvement and its capacity and technical expertise to take on the proposed role. Assurances and clarification were required that adequate resource would be dedicated to the roll-out and approval process and that the roles and responsibilities of Ofqual and the Institute would be clear and distinct in order to minimise risk of duplication and/or confusion.

172. In terms of quality standards, it was felt that the kitemark would not improve perceptions of level 4 and 5 qualifications alone. Recognition from industry and public perception were felt to be more important. As such, there was felt to be a need for adequate funding of HTQs to demonstrate commitment to them and a thorough and structured roll-out phase enabling sustained campaigning to raise their profile and prestige and to give provider organisations and employers time to adapt to new processes and design suitable, relevant programmes.

173. There was strong support for adopting flexibility into the approvals process. Attendees largely felt that the areas of flexibility proposed would ensure that qualifications are kept up-to-date (e.g. with technological developments), fit-for-purpose, suitable for key audiences, more financially viable and accessible. A smaller number of attendees cautioned against

incorporating too much flexibility at the expense of diluting the standards or compromising quality.

## C: Delivery of higher technical education (HTE)

### Summary

The HTE delivery part of the consultation asked respondents about the markers of high-quality provision, the principle of the OfS applying technical ongoing registration conditions to providers of HTE and a range of questions about funding and other support.

### Markers of high-quality provision

**The criteria suggested were regarded as suitable markers for a high-quality technical provision** by almost all respondents (95%). The criteria were: suitably qualified and experienced teachers; strong links with employer networks; learning environments that provide access to workplace facilities and equipment; and, similar criteria used in the Institute of Technology (IoT) assessment process.

In qualitative comments respondents stressed how the outlined criteria were not only suitable markers but fundamental to the delivery of high-quality technical provision that should be part of existing quality provision, not additional or separate conditions. Many felt that criteria already existed through various well-established quality assurance processes.

### OfS conditions

**The majority of respondents agreed (56%) with the principle of the OfS applying technical ongoing registration conditions** that a provider would be required to meet to indicate the quality of their HTE provision. Just over one in four respondents disagreed; there was especially strong disagreement among HE providers and awarding bodies.

Those who disagreed were, in the main, concerned that the proposals would add unnecessary process and make the system overly bureaucratic. Other reasons for disagreement included: concerns about the impact on resources; the expertise of OfS in determining technical conditions and the need to clarify roles of the various bodies involved.

### Funding and other support

**Nearly three-quarters of respondents agreed (74%) that linking grant or capital funding to meeting the technical ongoing registration conditions** would encourage providers to deliver high-quality provision.

- A large proportion of qualitative responses stressed that **funding should be linked to regional skills strategies and aligned with local needs**.
- A number of **areas were suggested that funding might support**, including: access to equipment, facilities and resources; investment in teachers or lecturers; facilitating links with industry or employers; programme development, new provision and build capacity; workplace learning; research, evidence and promotion.

**Many respondents indicated that additional costs could be a potential barrier to high-quality HTE delivery**, highlighting the critical importance of funding for providers and the need for substantial investment. Respondents thought the benefits that would result from additional costs should be clearly communicated to motivate providers and industry to engage with HTE delivery.

**Most respondents (87%) agreed that additional non-financial support would be needed** to enable providers to develop their workforce and engage fully with employers. The main example of non-financial support was building links between providers and employers. Other areas included: promotion, profile raising and sharing best practice; building capacity, new provision and addressing skills needs; information and guidance; supporting work placements; and, quality assurance.

Respondents were also asked to consider:

- How providers could best allocate their existing resources to build and support capacity and delivery of approved HTQs. **Respondents stressed the need to build strong networks across the HTE landscape and align provision** with existing high-quality provision and frameworks.
- Where additional help may be needed. Respondents highlighted the importance of **access to equipment and facilities, assistance with long-term employer engagement and, recruiting and retaining teaching staff.**
- Priorities in terms of any future allocations. Here **respondents had a range of funding priorities**, including growth and potential value added; establishing technical infrastructure then providing recurring funding; testing pilot initiatives; ensuring an equitable distribution of funding; reducing the impact on potential costs to students; raising the profile and prestige of HTQs; and, upskilling the existing workforce.

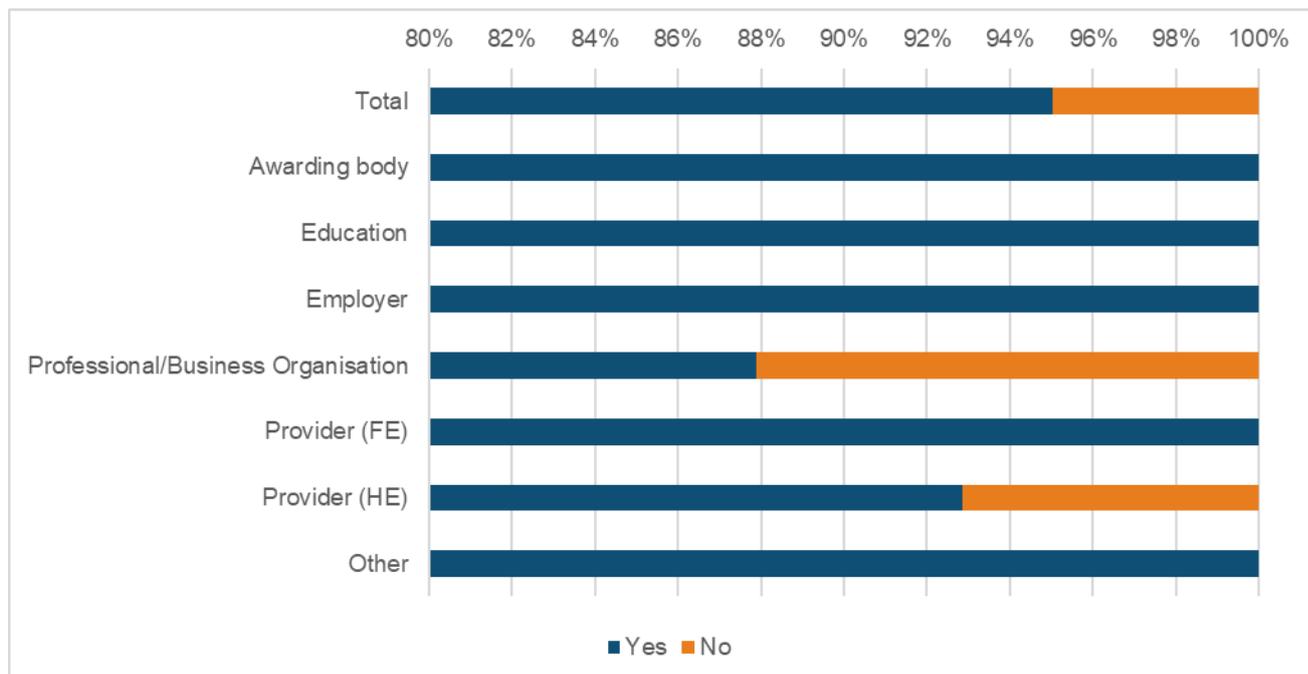
**Over three-fifths of respondents agreed (64%) that DfE should explore how providers that meet the ongoing registration conditions specific to HTE could have access to a more competitive student finance package** for courses leading to approved HTQs, than those who do not meet the technical conditions. Around one in ten disagreed, with over half of awarding bodies disagreeing:

- Although some agreed that a competitive student finance package would incentivise take-up, they had reservations about linking this to OfS registration conditions.
- Those that were supportive of the proposal felt that it would help drive up quality, build capacity and encourage take-up among students.
- Those less supportive were concerned that it could create a two-tier system and freeze certain providers out of the market, stifling student choice.

### Question 13. Are the suggested criteria suitable markers of high-quality technical provision?

174. **The suggested criteria set out in the consultation were:** suitably qualified and experienced teachers; strong links with employer networks; learning environments that provide access to workplace facilities and equipment; and, similar criteria used in the Institute of Technology (IoT) assessment process (such as support for regional and national economic growth, employer engagement, relevance to occupational skills needs, and quality industry relevant teaching).

**Figure 15: Question 13. (n=121 responses)**



Source: York Consulting quantitative analysis, 2020

175. There were 121 respondents that responded to Question 13 (This was 90% of all respondents). Figure 15 shows that most survey respondents believed the criteria suggested are suitable markers for a high-quality technical provision (95%). Of the 121 that provided a response to Question 13, only 6 responded stating ‘No’, indicating they do not believe they are suitable markers. Just two sub-types had respondents that did not agree with the markers being suitable: professional/business organisations and HE providers.

### Question 13. Reasons why the suggested criteria are suitable markers of high-quality technical provision, or why not.

176. A total of 91 respondents provided a qualitative response to Question 13. A number of general comments were made on how the outlined criteria are not only suitable markers, but are so fundamental to the delivery of high-quality technical provision that they should already be part of quality provision, not additional or separate conditions that should be met.

177. Several stated that the criteria already existed through various well-established quality assurance processes and/or are already embedded in approval processes. HEPs particularly stated that quality of teaching and learning environments are already heavily regulated.

*“The criteria suggested appear to be suitable; in fact they can already be applied to the providers, primarily modern universities, who have been delivering high quality technical, professional and vocational education for many years.”* Professional/business organisation

*“All of the above (except point 4) are embedded in our current provision, and enable us to remain cutting edge, leading industry, rather than following.”* Provider (HE)

### General comments (71 references)

178. Respondents made a number of general comments supporting the criteria, albeit some with reservations and/or queries. **There was a high level of agreement that providers attracting public funding should be required to meet specific criteria and that the proposed criteria were logical.** However, queries were raised about the practicalities of meeting the criteria and how they would be assessed.

179. The issue of funding was raised by several respondents. Although the criteria were felt appropriate in theory, it was stated that high-quality provision requires funding. Providing up to date facilities and equipment and industry-experienced staff was considered expensive and it was felt that investment was essential in helping build capacity, particularly in areas where technical gaps were predominant.

*“We would agree with these qualities but would point out that to achieve them the system needs to be adequately funded. Delivering high quality education cannot be done on the cheap and we would urge the department not to embark upon another set of reforms without first securing the investment that the sector desperately needs.”*  
Professional/business organisation

180. A number of comments were made questioning the criteria’s focus on inputs, rather than outcomes being delivered for learners, such as what learners will go on to achieve in the labour market, and there was uncertainty on how these would be measured. Focusing on inputs was not thought to align with the OfS objective of delivering positive outcomes for students, past present and future.

*“As registration conditions, these appear much more input focussed than other OfS registration conditions, which are more outcomes focussed. It is difficult to see how the proposed learning environment criteria could be*

*assessed at anything other than course level and we would query the practicalities of this.*” Professional/business organisation

*“Courses need to be able to show good outcomes and that they lead to skilled employment in the field of a student’s choice, and that they open up a student’s options in both their careers and in education.”*

Professional/business organisation

181. It was also felt that provision should not just be based on current skill needs but should equip students with the knowledge skills and behaviours required for the future. It was questioned whether the proposed criteria would determine whether qualifications were meeting this requirement.

182. Respondents also called for more research to be conducted to understand what determines high-quality HTE for students, employers and professional bodies, and for this, supported by labour market intelligence, to be fundamental to curriculum planning.

183. The importance of employers and professional bodies’ continued involvement in quality assessment and the need for the DfE to work with them and other organisations that already have high quality assurance schemes in place was also emphasised. This was deemed essential to ensure that delivery remains up to date, fit for purpose and provides a solid foundation for future service developments (particularly with regards to digital and technological innovation). Working in partnership with stakeholders would ensure agility is embedded into the system and that provision is able to adapt to emerging, not just up to date technologies.

*“A member recently reported that their apprentice in a construction business was taught outdated techniques, knowledge and skills. They had advised the apprentice to follow the provider’s methods for the sake of passing the end-point assessment but use the new method during the working hours. Whilst this is an example of an apprenticeship, it reflects the mismatch between the provision and the demand and indicates the importance of involving employers in the delivery of qualifications.”*

Professional/business organisation

### **Quality of course delivery and teaching staff (43 references)**

184. Respondents mostly agreed that *“suitably qualified teachers with current, relevant occupational and industry experience and expertise as well as high pedagogical skills”* was an appropriate aspiration for high-quality delivery. Largely, **it was felt essential to have teaching staff with strong links to industry who understand and are passionate about their subjects.**

185. Again, however, a number of concerns were raised about how this would work in practice. Several requests for clarification were made regarding the specific elements of the criteria such as how “*suitably qualified*”, “*current, relevant experience*” and “*high-quality pedagogical skills*” would be defined and the potential need for compromise under certain circumstances.

*“Teaching teams for technical provision should encompass this range of knowledge and skills, but there needs to be a degree of trade-off between teaching and industry experience for individual teachers as it is not achievable for every member of staff to embody all of these qualities.”*

Provider (HE)

186. There was a strong assertion across the different respondents that recruiting and retaining suitably qualified teachers with industry experience is extremely challenging. There were concerns that teachers are tending to leave the profession to enter into industry, rather than the other way round.

*“Further education already struggles to recruit a sufficient number of teachers, and this is without requiring them to be both experienced teachers and have current and relevant industry experience. To ensure colleges can source these teachers, they will require specific support from the government. This is especially true in STEM subjects, where we have a huge shortfall of teachers every year. Part of attracting the necessary quality of teachers will be ensuring that HTQs have a good track record with employers, but they will need time to build up this reputation.”*

Professional/business organisation

187. Specific issues of concern regarding recruitment and retention included:

- The lack of attractiveness of the teaching profession in general and its terms and conditions of employment.
- Increased workloads, stress and poor wellbeing.
- Lack of time and investment in continuous professional development (CPD) for teachers.
- An increase in precarious contracts for teachers.
- Providers not being able to offer remuneration packages comparable to industry.
- HTE teachers being drawn from the same pool of expertise as assessors and apprenticeship provision, where recruitment is already proving to be difficult.
- Criteria not being restrictive to the point that they act as a barrier to employing suitably experienced technical and professionals. In this respect, there needs to be an understanding of where technical, rather than academic skills, are a priority.

188. Other comments related to the importance of continual upskilling of teachers and industry’s role in ensuring knowledge remains up to date and that emerging and future skills

are appropriately mapped onto qualifications. Further, where relevant, there was some suggestion that teaching staff should be encouraged to gain membership of appropriate professional bodies or organisations.

### Facilitating links between industry and academia (44 references)

189. There was a general agreement that **strong links with employer networks are a key element of high-quality HTE and should be core to provision**. Greater collaboration was deemed essential to ensuring that qualifications are responsive to local and employer need, building clear progression pathways.

190. Indeed, some respondents suggested that the term “*links*” was not strong enough and that direct input from employers and industry was paramount in embedding knowledge and experience to inform and shape the delivery of HTE.

191. As with other areas of the consultation, a number of respondents were keen to state that there are already many good examples of strong networks and partnerships between employers, providers and professional bodies where provision has been developed in collaboration. It was felt important that best practice from these collaborations is shared and embedded to strengthen the functionality of the overall network and build capacity.

*“Institutes employ experienced professionals skilled in both teaching and in their industry setting. As we have noted, they have strong and long-held relationships with local employers. They are adept at identifying and responding to local skills, and they are in collaborative partnerships with other providers to ensure that learners are clear about progression and the next steps they need to take.”* Professional/business organisation

192. Nevertheless, creating networks can be challenging and requires considerable time, effort and resource from both the provider and employer. Respondents welcomed government involvement and support to help facilitate this. As highlighted elsewhere in the consultation, it was emphasised that any employer / industry involvement, groups, fora and boards should be representative. Not only should local needs be considered, but the voices of ‘harder to reach’ employers, including SMEs, and those working in niche areas should be heard. The process should not solely be guided by larger, high profile employers.

*“It is essential that employers, especially small businesses, are involved throughout all stages of the development of qualifications and are invited to offer on-the-job training as part of the qualifications. Employers should not just be engaged as an external reference network or get involved during the approval stage. There are currently higher technical qualifications, e.g. computing degrees, that do not reflect the needs of employers or industry.”* Professional/business organisation

## Access to facilities and equipment (21 references)

193. It was generally agreed that **access to good quality, state of the art facilities and equipment was important**, and in many cases essential, to providing high-quality HTE that is reflective of the working environment and ensures workplace readiness for learners.

194. However, it was again argued strongly that facilities and equipment require investment, and that this may be problematic for some providers. Setting this as a rigid criterion may therefore create resourcing issues for some providers and disincentivise participation.

195. Particular issues raised included:

- Providers will need to review and replace equipment and machinery on an ongoing basis and any future funding model should take this into account.
- Meeting this criterion may be a significant challenge for many providers, especially if they are not located near to employers or other institutions that can offer use of such facilities.
- Consideration should be given to how courses leading to HTQs can be delivered in areas of lower industrialisation, where access to facilities and equipment may be problematic.
- Some industry standard equipment may be prohibitively expensive or unsafe to operate in learning environments.
- In addition, it was suggested that alternative, non-traditional models of provision should not be overlooked.

*“It is important that requirements for students to have ‘learning environments (that) provide access to facilities and equipment that are reflective of the workplace’ does not rule out models of provision which delivers that access in partnership with employers or other providers or via remote access to equipment. This is a highly effective and efficient way to learn occupational skills.”* Other

## Assessment criteria (31 references)

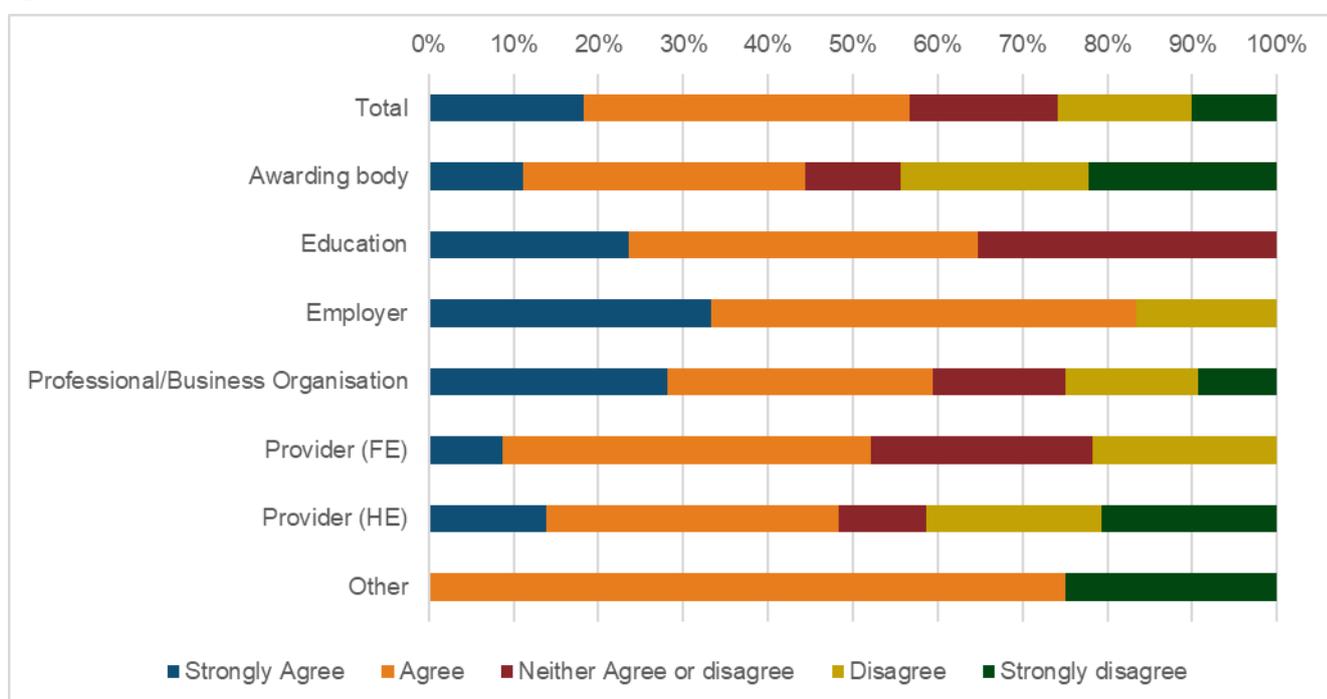
196. There was broad agreement that **the criteria used in the IoT assessment process would be a rational starting point for assessing the quality of HTE** and would ensure market relevance. However, a number of clarification points, requests or concerns were raised.

- Criteria should not be drawn up rigidly, but rather allow a degree of flexibility for providers to demonstrate how they are addressed.
- Further clarification was required over how, for example, teacher quality and industry-relevant equipment would be assessed and evidenced.
- There were differing perspectives on the proposed approach to IoTs and National Colleges being exempt from criteria, with those who disagreed questioning how the ongoing quality of these providers would be measured and assured.

- Clarification was required on whether ongoing conditions would apply to colleges only, rather than validating universities.
- Assurance was required that the criteria would not create barriers for disadvantaged students or adult learners e.g. by requiring them to travel to access provision in their chosen subject/sector.
- Concerns were raised that the ongoing set of registration conditions and an approval process involving numerous agencies may act as a disincentive for providers to deliver HTE.

**Question 14. 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?**

**Figure 16: Question 14. (n=120 responses)**



Source: York Consulting quantitative analysis, 2020

197. Figure 16 represents the level of agreement from respondents to 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’. 120 respondents responded to this question (90% of all respondents). Over half of respondents agreed with the principle (56%), however more than one in four disagreed (26%). There was especially high levels of disagreement among Provider (HE) and Awarding bodies (over 40%).

## Question 14. If you disagree, please give reasons

198. In total, 83 respondents provided a comment to support their views at Question 14. The highest proportion of references related to concerns that the proposals would add unnecessary layers to the regulatory process and make it overly bureaucratic. In addition, similarly to the responses provided at Question 12, concerns were raised about the impact on provider resources, the expertise of OfS in determining technical conditions and the need to clarify roles of the various bodies involved. A number of suggestions were made regarding alternative approaches.

### **Adding additional layers, creating an overly bureaucratic system and resource concerns (53 references)**

199. It was largely agreed that **providers should be regulated to ensure quality provision, alignment with the wider higher education sector and in order to communicate prestige**. Further, OfS involvement was felt, for some, to demonstrate the commitment to indicating the quality of HTE provision, which was appreciated. In addition, in order to meet the aims of long-term skills strategies, services improvements, new ways of working, technological enablement and ensure ongoing quality, it was argued that HTE provision needs to be reviewed and assessed on a regular basis to ensure it *“reflects evolving technologies and best practice within the sector”* (Professional/business organisation).

200. However, concerns were raised about the additional burden the proposed approach would place on certain providers. It was argued that providers are already monitored under current quality assurances process and act accordingly when issues with delivery emerge. The proposed approach was therefore perceived to add additional monitoring requirements to what is already a robust system of assessment. Further, it was emphasised again that in many areas, industry and providers already work together to ensure quality delivery that is relevant to the local market and that complicating this process through OfS registration, which would also incur financial and resources costs, could act as a disincentive.

*“We question the proposal to task the OfS with developing a set of technical ongoing registration conditions. There are already multiple processes for reviewing and assessing quality of provision including FDAP [Foundation Degree Awarding Powers] and TDAP [Taught Degree Awarding Powers] application processes, QAA [Quality Assurance Agency for Higher Education] and registration with OfS – each of these requiring significant investment from providers. Will a further process not simply add to bureaucracy and costs? We would welcome further information on how this would work and costs involved.”* Provider (FE)

201. Additionally, ABs were felt to have robust vetting and approvals processes in place already to ensure that providers are sufficiently well-resourced and staffed to successfully deliver qualifications. It was not always clear to respondents what the OfS process would add

to this, or alternatively why the scope of AB centre approval could not be extended, if felt necessary, to have additional criteria for courses leading to HTQs.

202. To avoid unnecessary duplication, it was felt that the OfS should look to adapt, rather than to add to, existing conditions and that the introduction of any additional registration conditions should provide clear added value.

203. The following additional concerns and areas for clarification were indicated:

- There were concerns about a dual approval system, with requests for clarification as to why providers would need to be subject to both OfS and Institute approval processes.
- There were also concerns that the OfS does not have the capacity and resources to undertake assessment of the conditions within the proposed timescales.

*“Bearing in mind the length of time it takes for the current process re OfS registration will there be sufficient resources to process in an efficient manner to ensure providers can respond fully within a suitable time frame that does not potentially jeopardise recruitment unfairly.” Provider (FE)*

- It was argued that it may be better to invest in building capacity for those already OfS registered and/or IoTs.
- Some respondents felt the process might introduce a *“tick-box mentality”*, or that it might be introduced without a full understanding of its wider impacts.
- The proposal was also felt to impact on HEPs’ autonomy to adopt their own assessment processes.

*“It is important that providers continue to manage their own assessment methods for their awards locally, in accordance with the regulatory framework and sector-recognised standards. We therefore suggest that a framework of good practice would be a better approach.” Provider (HE)*

### **Expertise of OfS in determining conditions and clarification on roles and responsibilities (25 references)**

204. As in responses to Question 12, **concerns were raised over the appropriateness of OfS in its current guise to adjudicate over the quality of HTE** and clarifications over roles were requested. Respondents wanted greater clarification on how the OfS conditions would interact with the existing range of regulatory bodies and how its remit and role would be distinguished. In addition, queries were raised over the degree to which OfS conditions are fit-for-purpose in a technical setting.

205. Specifically, queries and comments were raised around:

- Whether the current expertise in the OfS would be expanded to ensure it has the capabilities necessary to effectively regulate providers of HTE. It was felt that to

undertake assessment effectively, OfS would need additional technical support and access to specialist resources e.g. Centres of Innovation.

*“OfS must seek to expand its understanding of higher technical delivery and increase its base of individuals with this expertise. They should seek to understand the unique staffing, governance and delivery models to ensure their systems can meet the needs of these providers.”* Education

- Whether provision should instead be subject to Ofsted regulation given it was felt to have more experience of industry-focused technical / vocational provision.
- Whether the conditions would be reflective of technical provision or would be too academically focussed.
- Making exemptions, or having a transition stage, for higher technical-only providers that will not immediately access or benefit from the full range of OfS regulated provision.
- The limited awareness of OfS amongst employers and potential students, which could mean that OfS registration would do little to raise the profile and prestige of HTE.

### Alternative approaches and suggestions (17 references)

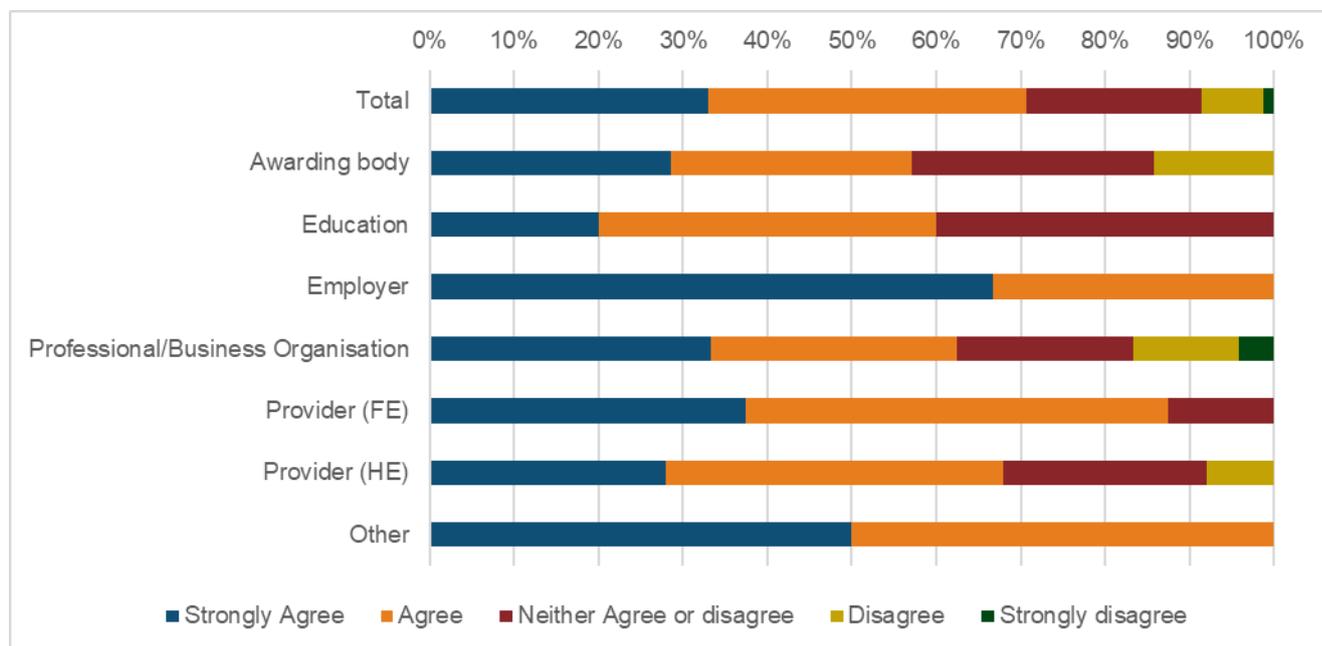
206. A number of **alternative suggestions were made that were perceived to be valuable in increasing the quality of HTE**. Notably, respondents proposed that it may be an opportune time to review, refine and align existing procedures and mechanisms (e.g. evaluating whether Ofsted and OfS procedures can be more aligned in the technical space). In areas where current standards of delivery are not sufficiently met, it was felt that existing standards should be built on and strengthened, rather than entirely new ones created.

207. Other suggestions included:

- Initial registration conditions followed by Quality Review visits.
- Establishing stronger links between OfS and professional bodies to:
  - Reduce costs and duplication.
  - Communicate industry recognition to students.
  - Elicit confidence in the qualifications within sectors.
- A register of approved providers of courses leading to HTQs.
- Adopting a similar approach to maintaining quality as other areas of further and higher education provision, for example:
  - The Teaching Excellence and Student Outcomes Framework.
  - Providing students with good quality IAG to help inform their decision-making.
  - Incentivising providers to maintain high quality provision.
  - Expanding the scope of the Register of Apprenticeship Training Providers.

## Question 15. 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?

Figure 17: Question 15. (n=82 responses)



Source: York Consulting quantitative analysis, 2020

208. Figure 17 shows the survey responses to whether, if grant or capital funding was linked to meeting the technical ongoing registration conditions, this would encourage providers to deliver high-quality provision. This question had the lowest response rate of 82 (61% of all respondents). Figure 17 shows that 71% agreed with the statement. Over one in five responded stating, 'Neither agree or disagree' (21%).

## Question 16. How might this work to ensure provision best meets local skills needs?

209. A total of 78 respondents provided evidence for this question. A large proportion of the qualitative responses outlined issues related to skills strategies, new provision and alignment with local need. Smaller numbers of responses highlighted access to equipment or facilities, links with registration conditions, having open dialogue and collaborative working, and having high quality qualifications linked to encouragement to develop new provision.

### Skills strategies / new provision / aligning with local need (43 references)

210. Some respondents referenced that **any linked grant or capital funding should be in line with regional priorities** (strategic economic plans/Skills Advisory Panel recommendations) and funding to support capacity building. Others mentioned the devolution of the adult education budget in particular areas and the importance of local influence around

such funding decisions. Some felt that funds should be routed through Local Enterprise Partnership (LEPs) to ensure they address sectors with identified skills gaps, replacement demand and/or growth potential.

211. Flexibility in any approach to funding was mentioned by respondents, particularly in relation to employers and local industry.

212. A few respondents felt that any application processes for grant funding would need to include evidence of local labour market shortages and/or endorsements from local councils, LEPs or combined authorities. One respondent suggested a local moderation process to ensure local bids are considered alongside the local context and other bids. Another felt that linking funding to meeting the current OfS conditions of registration could help enable provision to effectively meet local skills needs. Some explicitly mentioned that bids for additional funding should be through partnerships between employers and education institutions to show the genuine need.

213. There were also references to perceived complex funding systems and low funding levels. Some respondents referenced misalignment of supply and demand for people with technical qualifications and the importance of using funding to create a better balance with the skills demanded by employers (expressed through the Skills Advisory Panels).

214. There were differing views about the balance between allowing capital funding for new local centres versus national provision that can be “delivered locally in innovative ways...to ensure provision can begin while the market for the qualifications develops” (Education). Others felt that local-level models risked duplication.

*“Whilst local skills needs are important, much delivery will be sub-regional, regional or national to make it financially viable, as a consequence both local and national needs must be accommodated. The allocation of capital via LEPs has led to questionable duplication of provision in some cases.”*

Provider (FE)

215. Some respondents wanted more detail on expectations on providers to deliver particular outcomes and how these might be measured. Others felt that quality within HTE providers was an important attribute that should feature in any bid assessment process. There were some concerns that better resourced providers might have an advantage in securing further funding which might not always be in the interest of high quality, innovative, STEM provision or universal geographical coverage.

*“If there is not sufficient funding available then provision will grow predominantly in providers who are already well-resourced (which does not necessarily correlate with high quality provision in specific technical fields)’. FE colleges in cold spots, and high cost STEM courses could therefore lose out.”* Provider (FE)

## Having open dialogue and collaborative working (14 references)

216. Collaboration between LEPs and other local bodies, described above, was mentioned extensively, and **respondents thought that collaboration between local providers was important to avoid duplication.**

217. Some respondents suggested that support for employer consultative groups would be helpful, particularly where accreditation by professional bodies requires formal consultation.

218. Sensitivity to local sector impacts (for example, healthcare) was also felt to be important where services can be destabilised through recruitment of staff to teaching positions.

## Access to equipment or facilities (15 references)

219. While funding to support access to capital was acknowledged as important, **many respondents mentioned the additional ongoing expenditure required to maintain quality in STEM subjects such as engineering and healthcare.** This includes equipment for high-quality classroom-based simulation training. One education respondent felt that with strong employer links you can achieve access to specialist, up-to-date equipment without the need for upfront capital.

220. Other costs relating to equipment or facilities that were identified include:

- Maintenance of specialist equipment received from employers which a donating employer will not cover.
- High insurance costs associated with specialist equipment.
- Recurrent capital funding for replacement/upgrading of equipment.

## Links with registration conditions (15 references)

221. There were a number of references to the **positive benefits of linking additional investment with OfS additional technical registration.** However, there were others that cautioned about the risks of this approach, asking how providers would be supported to meet the conditions, which requires the demonstration of human and physical infrastructure. This links to a tension raised earlier between OfS registration and focusing on high-quality and innovative or new-to-area approaches.

*“To the extent that HTQs represent new qualifications with a different emphasis to 3-year degrees, the OfS registration process – that measures historic trend data – will need modification compared to the current registration process for HE programmes.” Provider (FE)*

222. Many respondents stressed the need to support a ‘range of providers’ to build their capacity to deliver new HTE provision.

223. One respondent felt that the weighting for registration conditions needed adjusting away from facilities and equipment, and more towards employer engagement, learner completion,

learner progression into employment/FE/HE, teaching staff technical competence and the quality of teaching materials (e.g. relevance to industry standards and customer requirements).

224. A few respondents supported the idea of drawing from the IoT assessment process to include evidence of support for regional economic growth and employer engagement.

### High quality provision (7 references)

225. A small number of references were made to **how providers could demonstrate quality** (for example registering with OfS for regulatory purposes), the importance of investing in high-quality teaching staff (salary levels) and how employers are supported to overcome financial barriers of engaging in qualification development.

226. One employer representative organisation pointed out that submitting an existing qualification for further accreditation would be time consuming and may not be worth the effort or costs. This may, they felt, act as a disincentive and lead to a lack of engagement.

### Other comments (24 references)

227. Other comments covered cost barriers, locational disadvantages, the role of OfS and the need for additional investment to support the FE sector.

228. Some respondents felt that degree-level funding would not be sufficient to meet the costs of high-quality HTE in some sectors based on their broader experiences.

*“The consultation declares that providers will receive the same amount of funding for approved qualifications as a bachelor’s degree. In the manufacturing sector, the funding bands for engineering don’t go near to covering the true cost of a bachelor’s degree therefore, any funding incentive will make little difference to covering any cost.”* Employer

229. Others were concerned about particular areas of the UK, such as the North East, where they felt higher inequalities could not be overcome by the funding incentives.

230. Some respondents highlighted the risks of minimum numbers of learners or contract sizes, working against the growth and development of smaller specialist technical provision. Similarly, others raised the importance of giving providers the time and support to develop and make the required improvements.

231. One respondent highlighted a finding of the Augar Post-18 Review that HE in FE providers have weathered significant and prolonged under-funding and, in their view, require additional support.

*“... despite these challenges, these [FE] providers have carved out a distinct role in developing and delivering technical qualifications. We urge the government to provide development funds to support HE in FE*

*providers to further participate in delivering technical qualifications and allow them to compete effectively with HEIs.” Provider (FE)*

232. While another respondent raised concerns about their perception of the OfS role in the process.

*“The proposed approach appears to be trying to centralise this approach and require the OfS to make what will likely be one-size-fits-all national judgements about regional skills needs when they lack a capacity to make such judgements. This may also be in contradiction to the duties in the Higher Education and Research Act 2017 to promote choice and to encourage competition.” Professional/business organisation*

## **Question 17. What specifically would additional funding support?**

233. A total of 80 respondents provided evidence for this question. Many responses followed similar themes raised previously in this consultation. Areas covered included: access to equipment, facilities and resources; investment in teachers or lecturers; facilitating links with industry or employers; programme development, new provision and build capacity; workplace learning; research, evidence and promotion.

### **Access to equipment, facilities and resources (44 references)**

234. References to what additional funding could support included:

- **Facilities** for students, including on campus.
- **Teaching infrastructure**, such as creating new teaching spaces, ensuring a high-quality learning environment, good broadband and improved information technology (IT) hardware and software.
- **Specialist resources and equipment**, e.g. dental technology equipment or robotics and artificial intelligence equipment.
- **Blended and distance learning models**, which require additional development funding prior to the commencement of delivery.
- **Replacing or updating out of date equipment.**

### **Investment in teachers or lecturers (42 references)**

235. Three broad areas were raised under this heading covering: attraction of high-quality staff, CPD and specialist staff to develop courses.

236. **Attraction of high-quality staff.** Many references were made to competition with industry and other education sectors for relevant staff. It was felt that specialist staff would need to be recruited to support high-quality delivery and that they were likely to need to be drawn from industry.

237. **CPD** of teaching staff was regarded as critical by many respondents and considered to be traditionally under-funded. CPD funding might also include funding for secondment opportunities for staff to maintain the currency of their skills and expertise. It was felt that a good CPD offer would also help in attracting and retaining teaching staff. Another important and related area included funding for cover to enable existing staff to engage in meaningful work shadowing and work experience to update their skills.

238. **Specialist staff to develop courses.** As one respondent described: *“While many higher technical staff employ industry experienced and relevant staff, the ability to design qualifications is not often one of their natural skill sets. This process will require activity outside of regular teaching and need funding.”* (Education)

### **Facilitating links with industry / employers (23 references)**

239. A number of examples of how links with industry can be improved were identified.

240. **Involving industry in the programme design process.** Funding for the support and co-ordination of skills providers and employers to develop and design training for pathways in key sectors was regarded as important.

241. **Employer engagement.** A number of respondents referred to employer engagement in general. One respondent felt that funding to increase staff hours dedicated to employer liaison was important.

242. **Improved day-to-day joint working.** Some respondents argued that consideration should be given to providing additional funding to enable staff exchanges between providers and businesses, such as visiting industrial speakers or industry specialists coming in to deliver in the classroom.

243. These above points relate to what one respondent referred to as ‘reducing the distance’ between teaching and industry.

*“It would be particularly beneficial to establish and fund robust mechanisms for reducing the distance between teaching staff and industry contexts, ensuring regular upskilling to inform and enrich the curriculum.”*

Professional/Business Organisation

244. Another respondent specifically referred to independent providers and the challenges they face with engaging with public sector bodies: *“Many independent providers are not part of their local economic architecture as they have not been eligible for local funding and not had additional resources to spare to participate.”* (Education)

## Programme developments, new provision and building capacity (23 references)

245. A range of suggestions for additional funding were outlined under this heading. These include:

- **Programme design.** This could involve exploring modular approaches to earning a HTQ, investments in blended learning and building infrastructure for credit accumulation and transfer and recognition of prior experiential learning. One respondent felt that *“Innovation in delivery [should] include flexible learning packages”* Provider (FE).
- **Accessibility.** Respondents considered that education must be accessible to all, and as such should incorporate participation for SEND students and those with other particular needs, such as care leavers or English as a second language (ESL) students.
- **Provider development support.** Where a provider does not currently meet the conditions specific to HTE, respondents felt they must have access to support and development to meet those conditions.
- **Links to centres of innovation.** Drawing on existing knowledge of innovation was seen to be important, with *“High Value Manufacturing Catapults”* considered to be ideally positioned to assist in programme design.
- **Funding to cover exposure to risks.** One respondent felt that funding should be available to cover exceptional costs associated with a new venture of this sort. The respondent pointed out that *“All new programmes bear a risk of a) reaching their intended market and b) developing the capacity to reach the quality benchmarks...identified”* Provider (FE). Another respondent mentioned programme development and quality assurance enhancement costs which they felt would be *“a good way of mitigating the entirely predictable and universal risks of delivering new provision”* Provider (FE).
- **Up-front investment costs.** One respondent argued that development of courses leading to HTE was necessary before provision could be treated as ‘business as usual’. Similarly, development costs for the design and development of teaching materials and delivery models for courses leading to HTQs were mentioned by another respondent. In another example, the focus was on capacity in the institution’s estate, which they felt would need investment to support significant growth.

## Workplace learning (15 references)

246. A few respondents felt that funding would be required to ensure that providers were able to offer enrichment and/or field activities to develop skills in a realistic context and better prepare learners for the job market. This might involve taking learners into workplaces to get experience.

247. Some respondents considered that if work-based learning was to be made compulsory, then financial incentives for employers to offer it would be necessary, otherwise employers may not come forward in sufficient numbers due to the perceived cost or burden. In particular,

some respondents flagged that they would need support for work-based learning and assessment within employers.

### Research, evidence and promotion (10 references)

248. Four further areas requiring funding were identified by respondents covering: evidence of need, market research, marketing and IAG.

249. **Evidence of need.** In order to tie bids into local skills needs, applications for grant funding in support of delivering specific courses should include evidence of local labour need and endorsements from public sector partners.

250. **Market research** to support the expansion of provision in local areas with skills needs was regarded as important. One respondent emphasised that qualifications should not only consider current need, but also where local skills needs would develop in the near future.

251. **Marketing** can be expensive and an important element to reaching learners and employers. One respondent felt that centralised marketing of courses would be important.

252. **IAG funding and influence** to ensure potential learners received impartial advice was identified by some respondents. Those that identified this issue felt it could help attract employees and make sure that HTQs are a preferred option to more traditional routes. One respondent stated that, *“we need to bust the myth that gaining qualifications means incurring a long-term debt at an early age”* (Employer). Other respondents pointed out the importance of supporting provider promotion of HTQs within schools, as well as amongst employers and parents.

### Question 18. Would additional costs be a barrier to delivering high quality HTQs, why?

253. Seventy-three respondents provided an answer to Question 18. 42 references were general comments largely agreeing that additional costs could potentially be a barrier and relating to issues around funding and the need for substantial investment. However, a number of respondents discussed the future value of this cost outlay.

### General comments (42 references)

254. General comments from respondents included:

- A concern that **additional costs would present a challenge** to the wide range of stakeholders involved in making reforms to HTE a success:
  - Employers may require financial support to direct time and work into forming partnerships with ABs.
  - Substantial upfront costs would be unattractive to providers, who typically operate on low margins, and the market may need to be stimulated to encourage them to invest. These costs may have a particularly acute impact in certain localities.

- Courses leading to certain HTQs are likely to be highly specialised and may have high delivery costs, including in relation to digitisation and upscaling and embedding technology.
- Noting that **many qualifications that are likely to be approved by the Institute are delivered by independent providers that do not traditionally attract public funding.**

255. A number of respondents alluded to the benefits that will be borne out of additional costs and the need for these to be clearly communicated to ensure palatability to providers and industry. It was felt that transparency in this regard was required and that an acceptance was needed that there are costs associated with attracting and retaining students through qualifications and developing future-proofed skills. However, this should be framed within the wider context and the measurable benefits this will bring.

*“Framework of funding and support should be aligned with the long-term benefits of businesses buying into HTQs” Employer*

*“The additional costs will be offset by greater cost efficiency resulting from high levels of provider collaboration and the modular offer creating additional channels to the up-skilling market for incumbent workers.” Professional/business organisation*

256. Following general comments, the highest proportion of references related to the costs associated with technical equipment, facilities and building an appropriate learning infrastructure and environment, and the recruitment and retention of high-quality teaching staff.

*“There are areas where provision of higher technical courses is more costly than academic pathways given the need for technical training infrastructure and for staff with up to date industry-relevant experience in order to deliver the qualifications most credibly. Without funding support for the items mentioned in question 17, it would be very difficult for providers to adequately scale up provision to meet the government’s ambitions.” Provider (HE)*

### **Technical equipment, facilities and associated costs (22 references)**

257. Respondents felt that there are **high upfront and ongoing costs associated with acquiring and maintaining state-of-the-art delivery environments**, facilities and up-to-date, equipment. Respondents considered it essential that these are industry-standard to replicate the reality of the workplace, ensure work-readiness of graduates and that the content of qualifications keeps pace with rapid technological advancements. Outdated facilities and equipment were thought to risk graduates entering the workplace unprepared for work.

*“Without sufficient additional costs related to capital upgrades, provision may start to drift from market responsiveness as providers find themselves unable to upgrade facilities in-line with the pace of change.”* Provider (FE)

258. It was felt that careful consideration is needed into how existing resources can be utilised to meet the demand for suitable training facilities and equipment, especially when it might be difficult for learning environments to recreate complex industrial environments or where sectors are unable to accommodate high numbers of students learning within the workplace environment.

### **Recruiting and retaining high quality, experienced teaching staff (17 references)**

259. As alluded to in responses to various questions throughout the consultation, **respondents emphasised that the suitability of course deliverers is a key aspect** of developing high quality technical education, and that there are high costs associated with recruiting and retaining staff who have both skills in specialist areas and pedagogical expertise. Staff costs cited included staff upskilling and training, maintaining CPD and supporting teachers to gain industrial experience outside of the classroom. In addition, it was noted that industry standard salaries and remuneration expectations of teaching staff are high.

*“For many providers already delivering HTE, there can be difficulties recruiting specialist staff particularly where industry standard salaries are significantly higher than those for teaching staff....It is absolutely essential that the currency of staff both in terms of their pedagogy and their industrial and professional skills is at the forefront of delivering HTE. These costs can be substantial.”* Provider (FE)

### **Other comments (42 references)**

260. In addition to the above, the following were mentioned as areas where additional costs may be incurred:

261. **Administrative and regulatory costs:** Several references were made to the administrative cost and impact on workloads associated with maintaining OfS registration and other regulatory responsibilities. Regulatory costs were seen to be rising and this raised concerns about diverting resources away from delivery, with a particularly detrimental impact on smaller providers.

*“Rising costs associated with regulation are taking funding away from the quality and delivery of the course to pay for both the cost of regulation and the resource cost of continuing to comply with regulation. Government should undertake a careful market analysis to ensure that SME education providers are not priced out of HTQs through the burden of regulation.”*

Education

262. **Smaller markets:** It was felt by some that many of the existing qualifications that may become approved HTQs are in specialist areas and/or are run by SMEs. Although relevant and important in ensuring a diverse market and the development of niche skills, running such courses can be prohibitive owing to the small numbers of learners they attract. It was argued that this could make it challenging for providers to deliver these courses.

*“In general, science courses are expensive to run and may be unsustainable to run with low numbers, as may be the case before the qualifications gain popularity. Education providers may need specific support to grow their provision of HTQs.”* Professional/business organisation

263. **Course development and set-up costs:** For HTQs to be successful, respondents thought that they would require partnership and collaborative working from a range of stakeholders, which has associated costs. It was noted that where these relationships and networks are non-existent or in their infancy, they would take time and resource to build. Development of new provision in the technical arena was considered risky, and without support and/or confidence that student numbers will cover the costs, respondents felt that set-up costs could represent a barrier to market entry.

*“The following additional costs would provide barriers to delivering high quality HTEs: small (unviable groups) due to initial low take-up while awareness is raised; recruitment, training and salaries of specialists to deliver HTEs in an underfunded FE and Training sector; collaboration costs needed to ensure progression routes and a fully integrated offer at the level of functioning economic areas.”* Professional/business organisation

### **Question 19. Which would be a greater priority: capital or recurrent grant funding? Or both equally? Why?**

264. Question 19 was answered by 75 respondents. The strength of feeling was that capital and grant funding were equally important. General references were made to capital funding being important for the upfront costs to build infrastructure and ensure the acquisition of up-to-date facilities and equipment, but with recurring grant funding also required for long-term sustainability to meet ongoing costs associated with design, development and quality delivery.

265. A number of references were made to the fact that the importance of either funding stream was dependent on the provider, including the nature of their current estate, their financial position, the provision they offer and local need.

*“This is very difficult to answer as it depends on the context of the provider, their history and the ‘newness’ of the HTQ. We believe both*

*forms of funding will be vital for most to support new and cutting-edge provision for purpose in the future.” Provider (HE)*

### **Importance of capital funding (48 references)**

266. It was argued that **due to years of perceived underfunding of level 4 and 5 provision an injection of capital funding is required upfront** to fund infrastructure and ensure that high-quality delivery occurs from the start. Respondents believed that capital funding was essential for investment in facilities and equipment, building capacity and partnerships and setting a solid foundation for future growth.

267. For many sectors, especially those relying on innovative practices, this was thought to require substantial investment.

268. Capital investment was also felt to be necessary to fund investment in IT and remote access facilities.

### **Importance of grant funding (51 references)**

269. Respondents outlined a number of reasons for the importance of grant funding.

270. **Sustainability:** Recurring investment was felt to be essential to support programme delivery, maintain quality of provision and ensure that the content of qualifications remains up to date. Having a stable funding stream would allow providers to develop courses into the future, supporting course longevity.

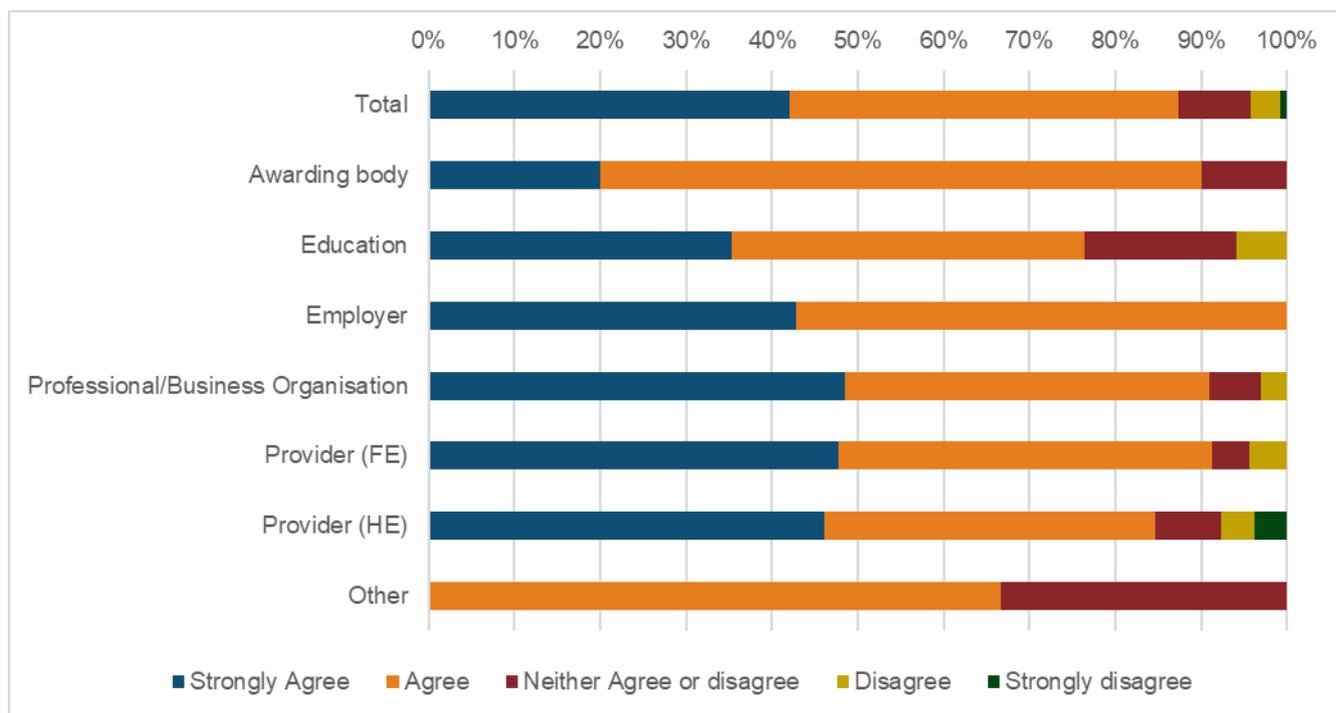
271. **Quality teaching staff:** The recruitment and retention of HTE teaching staff was a key area of concern for respondents and additional support was thought to be required in engaging suitable individuals with the appropriate skill sets. Industry-competitive salaries, development of CPD and securing staff able to link in and engage with industry all result in demands for recurrent funding.

272. **Need for dynamic qualifications:** In several sectors, markets are rapidly changing and evolving. Respondents felt that to stay ahead of the curve qualifications would need to be adapted accordingly, requiring long-term, on-going funding.

273. **Student support:** Grant funding was considered important to ensure accessibility, widen participation and ensure students from a broad range of backgrounds are encouraged and supported to take up qualifications.

## Question 20. 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?

Figure 18: Question 20. (n=119 responses)



Source: York Consulting quantitative analysis, 2020

274. The number of respondents to Question 20 was 119 (89% of all respondents). Figure 18 shows that 87% of respondents agreed that additional non-financial support will be needed to enable providers to develop their workforce and engage fully with employers. This is consistent across all sub-types and only 4% of the respondents disagreed with the statement.

## Question 20. What might examples of non-financial support be?

275. A total of 73 respondents provided evidence for this question. Many of the examples were very similar to those identified for funded support. In some cases, it is hard to see how these might be non-financial forms of support or there is a contradiction with the earlier section. The major area identified was about building links between providers and employers. Other areas included: Promotion / profile raising / sharing best practice; building capacity / new provision / addressing skills needs; information and guidance; supporting work placements; and, quality assurance. Responses to this question were from a range of respondent types, most commonly providers (FE), providers (HE), education and professional/business organisations.

## Building links between providers and employers (91 references)

276. A range of examples of non-financial support were identified linked to provider-employer collaboration.

277. **Industry experience for provider staff:** Models of engagement with employers referenced by respondents included: sabbaticals in industry or secondment exchange programmes where employer and provider personnel share their activity and expertise to build greater capacity across the system; extended periods of time in industry to upskill staff; projects such as DfE's Taking Teaching Further Project; and, opportunities to access local employers in-house training for provider staff.

278. **Employer engagement:** Many references were made to supporting employer engagement, including more advanced joint working such as co-creation and co-delivery of curriculum, as well as access to resources and possibly donation/sponsorship of equipment. One respondent pointed out regional variations in employer engagement, particularly outside of Greater London and South-East England. Providing support to connect providers with employers in other areas was considered to be worth exploring.

279. **Sector engagement:** A number of different respondents highlighted a variety of sector engagement activities, including: stakeholder engagement events which are positive for networking and information sharing; a form of centralised portal for facilitating provider-employer engagement; support from ABs; national fora and national monitors of standards; and, greater collaboration between further and higher education (an example was give of UUK's 'Routes to high-level skills' report in 2018 which illustrated that collaborations work well to meet the needs of learners).

280. **Provider support:** Some respondents agreed that the suggested provider support in the consultation looks largely suitable (although one respondent said that many FE colleges and universities will already have extensive employer engagement activity in place). Areas highlighted included: pedagogical support (especially for providers who do not currently deliver level 4 and 5 qualifications at scale and/or are seeking to develop new HTQ courses); clear guidance from DfE regarding expectations of employers and providers; a role for DfE/the Institute to help promote engagement (especially for employers without national skills organisations to help them to articulate their needs) and help them through the development process; national placement management schemes to allow providers to access a wider set of placements and deepen their relationships with employers; and, help with developing networks, supporting best practice sharing events and developing innovation hubs.

281. **Sector advocates:** A range of ideas were suggested by respondents. One mentioned by a few respondents was a comparable Advanced HE fellowship programme and professional standards framework for staff in technical education to recognise industry skills and expertise, and support the development of teaching skills. This was regarded as helpful for creating a pathway to teaching for industry experts, which can be difficult, and supporting providers to identify high quality staff during recruitment. A similar concept was an idea of local

HTE 'champions' employed by the local authority working in a similar way to the Aim higher work currently focussed on university education. This would then provide an independent link between industry and education, signposting each to the most appropriate 'partners'. One other interesting example was that personnel reaching retirement age could be targeted for secondment exchanges with newer teaching/training staff to help pass on experience.

282. **CPD:** A variety of CPD related non-financial support were mentioned, including:

- Sufficient time for personal development.
- Teachers attending briefing sessions inside employers' workplaces.
- Engaging current staff and teachers in the discussion of their own development needs, "*so that this policy change can be enacted participatively*" (Professional/business organisation).
- Train the trainer activity.
- Working with stakeholders undertaking development activity, for example, the Gatsby Foundation was mentioned as undertaking a programme of work to improve delivery of T Levels, which includes development of a training module for industry employees who are mentors for placement students.
- Building on the knowledge and expertise of those on mixed teaching contracts so, for example, those teaching on T Levels can help to teach at level 4 and 5.

283. **Initial teaching staff training:** Respondents suggested that DfE could work closely with professional bodies to integrate teaching and support for HTQs into the higher levels of their professional qualifications. They felt that this would "*encourage those at the peak of their technical career to step into the classroom*" (Other). One respondent simply said that providing the best possible quality teaching, learning and progression opportunities for students moving into the sector was critical. Another respondent highlighted the potential to learn from the results of related research, such as The Gatsby Foundation's work to improve delivery of T Levels, which includes: better understanding of teachers' roles, support for appropriate initial teacher education for FE teachers and the development of teachers' pedagogical knowledge and skills.

284. **Support staff:** One respondent highlighted that support staff in technical education will also need to be developed. They pointed to skills shortages in technicians to support engineering and digital provision and professional staff to support students with disabilities and educational needs as particular areas of need. These workforces were regarded as needing more support from government and national training bodies, with the addition of HTQs considered to put strain on "*an already stretched workforce*" (Education).

285. **Critical mass:** One respondent described the results of research that suggested that a barrier to providing higher technical apprenticeships for smaller chemical firms included having too few respondents on these courses to make it financially viable to run them. One recommendation to overcome this barrier was suggested as aggregating the learners from a number of small to medium sized enterprises to make it worthwhile for local education

providers to run HTQs. They felt that DfE could provide local knowledge and create relationships between education providers and local businesses – particularly in regional concentrations – so, in the example of the chemical sciences industry, there is considered to be a significant regional concentration in the North West and North East of England.

286. **Smaller, specialist providers** were considered to require non-financial support in addition to funding incentives. For example, it was thought that some providers may lack the resources to put in place a dedicated employer engagement team to liaise with employers to assess their skills needs and establish if there is sufficient demand to justify investment in staff, learning materials and other resources required to deliver a new programme.

### **Promotion, profile raising and sharing best practice (31 references)**

287. Respondents were **highly supportive of a strategic, centrally driven, national approach to a marketing** and a communication campaign to raise awareness and drive demand for HTQs. Additional elements included: involving the public sector to ‘lead the way’; co-ordinated promotion alongside T Levels and apprenticeships; and, targeting business representative bodies to ensure that the message is delivered directly to employers by experienced and trusted sources. Many suggestions of a similar nature were made. Some examples are listed below to emphasise the language used.

*“This is a need for the government to develop a simple ‘call to action’ and ensure that there is a consistent and sustained campaign to promote these qualifications.”* Provider (FE)

*“Central government marketing campaign aimed at employers to engage with HTE, to pledge to offer placements, live briefs and guest speaking.”*  
Provider (FE)

*“Involve the public sector in leading the way for the adoption of technical qualifications – developing the qualifications, promoting the benefits of higher technical education and establishing a recruitment campaign for higher technicians and technical skills.”* Provider (FE)

*“Recent experience (3 million apprenticeships, 50% young people participating in higher education) has demonstrated that clear and continued messaging by the Prime Minister and Senior Ministers works. Such a clarion call will support efforts to engage employers and recruit teaching staff with industry experience.”* Provider (FE)

288. More specific areas of focus on a wider marketing and communication campaign were identified as:

- Supporting provider promotion of HTE within schools.

- Supplement marketing with detailed guidance, career pathways and progression opportunities alongside apprenticeships and more traditional HE routes.
- Support to create local and sectoral networks of best practice in promoting HTE.
- Support for providers in attracting widening participation students to HTE. One respondent emphasised that a focus of these proposals should be to encourage more people to progress from a level 3 qualification, many of whom will be from disadvantaged backgrounds and may not see higher education as something for them.
- Ensuring university acceptance of HTQs to raise their value.
- Using the language of higher technician and higher technical skills to maximise the impact of the message for recruitment.

*“Targeting representative organisations for HR and recruitment staff is also essential; to achieve traction we need to see the establishment of higher technician schemes and job adverts using the language of higher technician and higher technical skills – and actively seeking candidates with higher technical qualifications.”* Provider (FE)

- Including a ‘return on investment’ message that demonstrates the salary expectations and career opportunities in highly-skilled technical fields, as well as routes to progression beyond level 4 and 5.
- Ensuring messages work for SMEs as well as larger organisations.

*“Support from central and local government around employer awareness and ‘buy in’ to the new programmes will be essential to the success of the new HTQs. Employers will begin to see the benefits of the T Levels once the students graduate but further work is required to ensure the SME market is aware, as much work has currently appeared to focus on the trailblazer groups and large multi-nationals.”* Provider (HE)

- Sharing best practice on how to maximise working relationships with employers.
- Ensuring there is greater transparency over who is currently working on occupational standards will also help improve the quality and quantity of the standards.

### **Building capacity, new provision and addressing skills needs (27 references)**

289. A range of points were made under this heading, with some overlap to the earlier subheading.

290. **Planning for the workforce needs of the future:** One example given was that local employer panels could review delivery outcomes and monitor changes in local skills demand, predicting increases or decreases in market demand and expectation. Another respondent suggested ensuring that those with industry experience can communicate and teach effectively, using diverse approaches for inclusive education. They saw this as particularly

important given the Equality Impact Assessment's indication that these qualifications could have significant uptake from SEND students.

291. **Provider networks:** One respondent made an argument for deliberately creating a co-ordinated support network of HTE providers – for example, with IoTs and National Colleges at its heart – committed to embracing reforms, piloting ideas and sharing good practice. It was suggested that this could be facilitated by a representative charitable body such as The Gatsby Foundation. Another respondent felt that there was an opportunity to increase sharing of costs and to increase 'connectivity' within the provider network with the contribution of supporting organisations such as Catapults. On a slightly more negative note, one respondent stressed the need for a joined up and coherent approach to support work with employers towards a shared national vision of HTE. They felt that the competitive nature of apprenticeship provision, with some HEPs moving into traditional FE territory, did not facilitate collaboration.

292. **Progression arrangements into HTE:** Respondents felt that it would help providers if they were able to identify progression arrangements between T Level provision and HTE, in addition to links with National Colleges and Institutes of Technology.

293. **Programme design:** One respondent felt that the most important aspect of provision was to ensure that roll-on roll-off opportunities were available at each level, with mixed modes of study and flexible financing so that those returning to study could take breaks and build towards their ultimate qualification level whether at 4, 5 or 6.

### Information and guidance (21 references)

294. This heading covered two main areas: IAG services to support the flow of students into provision and information and advice to employers and providers about establishing the provision.

295. In terms of IAG, **several respondents suggested enhanced career information, advice and guidance.** One respondent felt that a third-party organisation, such as the Career and Enterprise Company, could be approached to liaise between provider and employer and/or college/school and provider for effective communication. Another said that developing links with government supported IAG providers was important.

296. Other areas related to OfS registration, guidance on what would be expected of employers/providers, use of professional bodies/ABs to support communication with employer networks and examples of communications media.

297. **OfS registration:** One respondent felt that there had been a large number of rejections received by providers who have attempted to register with the OfS and a backlog in processing registrations, which they saw as increasing the need for support with the application process.

298. **Employer/provider guidance:** A few respondents highlighted that employer contributions via Route Panels, similar to the development of T Levels, needed to be as

efficient and streamlined as possible. They felt that non-financial support could include the DfE making it clear what is required of employers and providing guidance.

299. **Professional bodies/ABs to support communication:** A few respondents suggested that DfE could look to established ABs and professional qualifications that focus on employability to act as a champion for demystifying qualifications to their existing employer networks.

300. **Examples of communications media:** A variety of media and mechanisms were suggested including: downloadable factsheets, workshops/training sessions, information briefings, funding information, an advice line for both providers and employers to answer questions quickly and efficiently and frequently asked questions (FAQ) via a website.

### Supporting work placements (13 references)

301. Two key themes emerged under this heading: **on the one hand relating to support for work placements, and on the other disagreeing that they should be required.**

302. A variety of suggestions covered; brokerage to support work placements, establishing an on the job learning register to give students access to employers, industry visits for learners, study time and on-site work experience.

303. There were some differences of opinion regarding the provider's role here. Some felt that there should be provider-led administration of placements, while others felt that the burden should not be on providers.

*“Work based and work-related learning is especially important in STEM subjects, however as it is made clear earlier in the document that HTQs will be mostly classroom based it is important that the requirement to find any work placements is not placed solely with the college. An online based third-party placement broker might be helpful e.g. <https://placer.co.uk/>.”*  
Professional/business organisation

304. One respondent felt the consultation document contained some contradictions regarding work placement.

*“Work placements are identified as an important, ‘non-financial’ part of HTQs. This contradicts other parts of the consultation document which states that HTQs should be deliverable, if necessary, entirely as taught programmes within a classroom environment. Any well delivered placement is likely to require some financial and non-financial burden on both the provider and the employer.”* Professional/business organisation

305. Another respondent did not think it was realistic to expect more support from employers in providing work placements as they felt employers were likely to prioritise apprenticeships and sponsored undergraduates.

## Quality assurance (6 references)

306. A small number of respondents highlighted issues in relation to quality assurance. These included: teachers being required to gain Chartered Engineer or Chartered Scientist status before gaining promotions; using a process of accrediting trainers through Education and Training Foundation (ETF) standards; and, ensuring transparency over who works on occupational standards.

## Other comments (20 references)

307. Additional comments were provided that did not fit under the above headings. These are described below:

- Some respondents felt that there were no 'examples of non-financial support' as they believed that everything has a cost associated with it.
- A few respondents highlighted perceived historical underfunding of FE and were keen to stress that non-financial support would only work in addition to the financial support that would be required to offer high quality and meaningful HTE, particularly in STEM subjects.
- One respondent stressed that employers do currently support much of the provision currently available, by releasing employees and apprentices and by paying salaries, and by mentoring those on placements.
- Another respondent stressed the importance of developing student unions and strong student engagement in providers which do not already have them, in order to ensure engagement in regulation and teaching quality and improve retention.
- A few respondents raised the importance of the programme supporting the increase in social value.

## **Question 21. 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.**

308. In total, 75 respondents gave a qualitative response to Question 21. A number of general comments or points for clarification were made:

- Further information on T Levels, including educational outcomes and assessment plans, would help determine the resources required for the delivery of HTE and explain how T Levels will prepare learners for study at level 4.
- The interaction and coordination of HTE with other programmes, such as apprenticeships, should be maximised.
- The needs of providers may vary, particularly geographically, and support should be tailored according to need, with greater incentives in some areas to stimulate markets.

- The position of ‘non-technical’ qualifications at levels 4 and 5 and how they align with the objectives of the proposed reforms needs further consideration and clarification. There is a potential risk of restricting HTE to focus on skills development for a specific job, rather than career-long skills that support progression.

### Allocating existing resources

309. The key themes discussed by respondents on mobilising existing resources to support and build capacity and delivery were the need to build strong networks across the HTE landscape and align provision with existing high-quality provision and frameworks.

Respondents believed that to strengthen the quality and relevancy of HTE delivery effectively using existing, partnership working would be extremely important, if not essential. This was the case both in terms of industry-provider networks, but also through provider-provider collaboration. Collaborative and long-term partnership working was thought to be beneficial to facilitate shared-learning and action, avoid duplication of delivery and to create streamlined progression pathways and system-wide cohesion.

310. Building **industry and employer networks** was considered time and resource intensive, requiring input and continued commitment from a wide-range of stakeholders. However, this investment was thought necessary to establish clear, effective local delivery plans that partners have a vested interest in and are confident they will benefit from.

311. Greater **collaboration between FE and HE providers** was also deemed to be paramount to establish clear progression opportunities for students, identify skills gaps across the network and to tailor delivery to market needs. In addition to joint course offerings, these partnerships could also pool resources to initiate joint communications and outreach strategies to engage students and industry.

312. Several respondents provided examples where partnership and collaborative networks have been long-established and are functioning successfully. Providers and employers highlighted cases where they had a long history of working with each other in designing courses to develop market-ready skills to meet local needs, which could potentially be used to showcase examples of best practice.

313. Examples of existing or potential partnership working initiatives or models included:

- Development of “Centres of Excellence” to facilitate links between academia and industry and reduce duplication of provision.
- Co-ordination and sharing of specialist equipment and facilities.
- Joint communication and outreach strategies to engage students and industry.
- Employer creation of on-site academies.
- Project-based learning brought to the provider to encourage multi-disciplinary and systems thinking.
- Blended learning approaches.

- HE institutions acting as “*knowledge partners*” to build capacity and develop programmes, with FE colleges providing delivery, face-to-face expertise, equipment and facilities and links into local industry.
- Hub and spoke provision to ensure accessibility in less well-connected / rural areas.

*“We have been offering technical and professional education for more than 125 years and HTQ-equivalents for more than 50 years. We have achieved the latter by ensuring that our curriculum is aligned to the needs of the economy, is wanted and needed by employer partners and co-created it with them, for them. So, re-aligning the curriculum offer to the approved HTQs where there is demand in their locality in partnership with employers is the starting point.”* Provider (FE)

### **Additional help required**

314. The three key areas where additional help was felt likely to be required were access to equipment and facilities, assistance with long-term employer engagement and recruiting and retaining teaching staff.

315. **Accessing equipment and facilities:** A key concern for respondents was that learners on certain courses are using out of date technology and equipment. Improving and upgrading facilities and providing access to appropriate technology and equipment was required to ensure learners have access to industry-standard environments. Sharing resources and employer-sponsored equipment were mentioned as potential solutions.

*“The requirement proposed in paragraph 61 of the consultation document for HTQ providers to provide access to specific learning environments may cause difficulties for some smaller or more remote organisations. With the support of DfE and local authorities, networks, partnerships, or consortia could be established as a possible route to sharing resources and connections with employers.”* Provider (HE)

316. **Employer engagement:** Industry commitment was perceived to be fundamental to the delivery of HTE. Employers were felt to have a significant role to play in offering mentoring, peer to peer support and guidance on skills needs, gaps and forecasting. Where academia-industry networks do not yet exist, it was felt that employers should be encouraged or incentivised to engage. From an employer perspective, it was essential that providers demonstrated a willingness to understand their sector and needs.

317. **Teaching staff:** Help may be required in the recruitment, retention and upskilling of teaching staff. This is perceived to be a particular challenge, especially as technical courses are likely to be smaller, making financial viability difficult. It was suggested that HTE delivery may be able to capitalise on the workforce development investment made for T Levels, enabling staff to work across the various learning streams.

## Funding allocation priorities

318. A number of general points were raised regarding funding:

- Funding should prioritise future growth and value that can be added to the economy nationwide and locally. A more coherent skills strategy is required given that current gaps in provision are hindering progression routes and the development of future-proofed skills.
- Initial funding is required to build expertise and build a suitable technical infrastructure. Following this, recurring funding should be allocated to ensure high-quality, market-relevant delivery is sustained.
- Funding needs to recognise the high cost of delivering high-quality HTE. Students should not have to pay more to study a technical subject.
- Funding would be valuable to pump-prime or pilot initiatives. Lessons learnt from these initiatives could be used to develop a coherent suite of qualifications moving forwards.
- The Augar review concluded that to build HTE capacity, substantial investment and greater equitable distribution of funds is required.
- All types of providers delivering high-quality HTE, including HE, FE and private providers, should be considered regarding access to funding.
- Funding considerations should take into account the importance of upskilling the existing workforce and not just attracting and developing new entrants.

319. In addition to these general points for consideration, a number of specific areas on priorities for funding allocation were discussed:

320. **Raising the profile and prestige of HTQs:** A significant challenge regarding take-up and interest amongst students (and parents) and industry engagement with HTE is the understanding of their value. It was argued that to demonstrate commitment, the government needs to publicly endorse and promote HTQs as a viable and credible route on the national and international stage and support this through sustained funding.

321. Clear and consistent messages, with a simple 'call to action', from senior government ministers and officials were considered important in raising awareness of HTE and communicating their value to *"help address issues relating to the image and perceptions of FE as 'second tier' and help promote teaching in FE as a fulfilling career"* (Other organisation). Recent experience (3 million apprenticeships, 50% young people participating in higher education) was thought to demonstrate that this approach can work.

322. Respondents thought that areas of certain industries might lack buy-in and the resources to commit to the proposed HTE reforms. Raising awareness in these industries and supporting employers to articulate their needs for future curriculum development would be valuable in encouraging engagement.

323. **Teaching and delivery:** As in responses to previous questions relating to the challenges and barriers to delivering high-quality HTE, a number of references were made to

the difficulties in securing good-quality teachers with high-levels of relevant industry experience. Enticing and incentivising individuals into delivering the was therefore felt to be a priority.

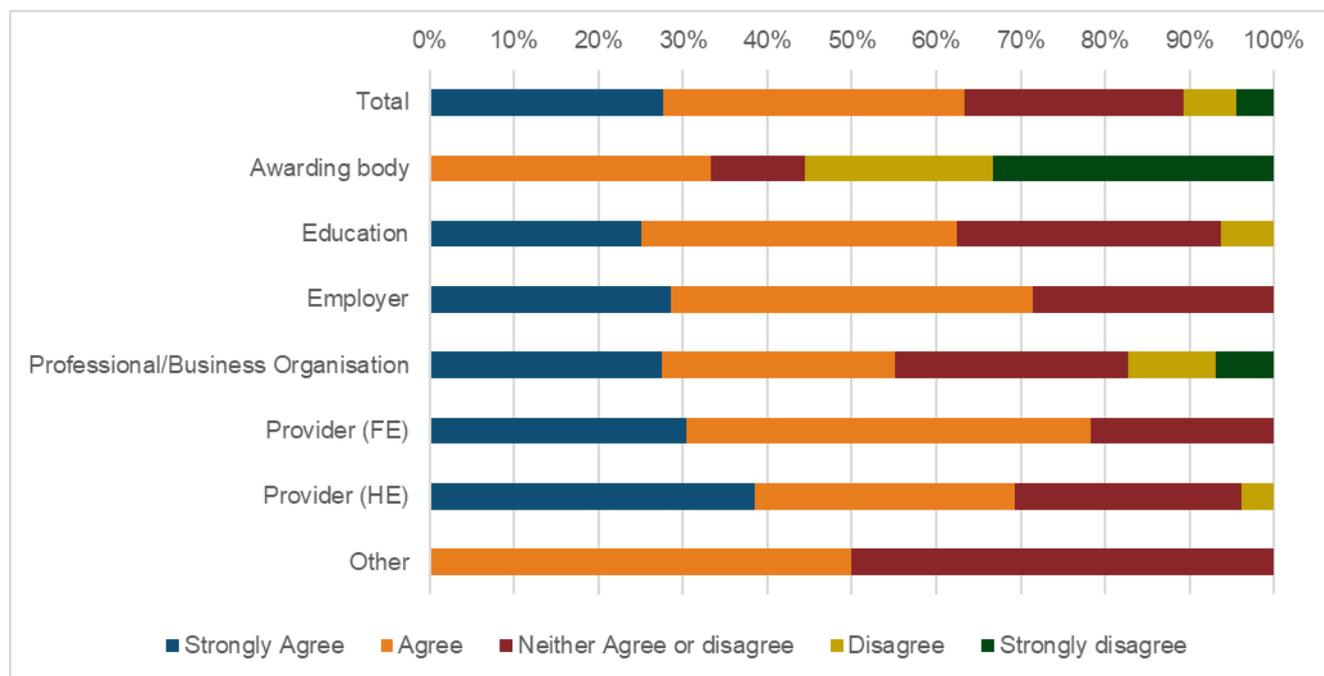
324. **Skills shortages and regional need:** Skills and sector strategies, local need and industries that have been pinpointed as key areas for growth were considered as important reference points for determining funding distribution. In addition, it was noted that, as well as targeting skill-shortage areas with funding, national outreach campaigns are required to raise positive perceptions of these areas amongst the public.

*“Avoidance of duplication is essential and we would need evidence of the specific nature of the regionally-specific demand from employers and potential students. We would also need to see how this aligns with the Industrial Strategy and how it joins up with existing plans.”* Provider (HE)

325. **Primary and secondary funding:** A number of references were made to the importance of increased funding in primary and secondary schools so that the value of technical subjects is instilled at an early age.

**Question 22. 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?**

**Figure 19: Question 22. (n=112 responses)**



Source: York Consulting quantitative analysis, 2020

326. There were 112 respondents to Question 22 (84% of all respondents). Figure 19 shows over three out of five of the respondents (64%) agreed that DfE should explore how providers that meet the ongoing registration conditions specific to HTE could have access to a more competitive student finance packages for courses leading to approved HTQs. Around one in ten disagreed, although, over half of ABs disagreed. Over one in four responded with ‘Neither agree or disagree’ (26%).

**Question 22. Why should we 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?**

327. Ninety respondents provided qualitative comments to Question 22 and the views expressed were varied. Generally, respondents either agreed or disagreed outright with the policy proposal or agreed that whilst a competitive student finance package was required to incentivise take-up, they had serious reservations about linking this to OfS registration conditions.

328. Those that were supportive of the proposal felt that it would help drive quality and build capacity. Those that were not were concerned that it could create a two-tier system and freeze certain providers out of the market, stifling student choice.

329. Several requests for further clarification were also made and it was felt that further consultation with students and stakeholders was required specifically on student finance in relation to HTQs.

### **Creation of a two-tier system (42 references)**

330. For those that disagreed with linking student finance to ongoing registration conditions, **key concerns related to introducing inequality into the system**, reducing choice and penalising both providers and students. Whereas it was agreed that there should be a benchmark by which quality is assured, choice and access were perceived to be a priority. It was therefore felt important that there was still an opportunity for non-approved qualifications, or courses delivered by providers not meeting the OfS conditions, to be eligible for student finance if they met local need.

331. In addition, the proposed technical conditions also raised concerns. As outlined in responses to Question 14, questions were raised about the value and necessity of this proposal. It was argued that many providers, ABs and professional bodies are already subject to rigorous regulation, meet professional standards and deliver high-quality qualifications and that they therefore should have access to student finance without needing to meet additional regulatory requirements.

332. Specific concerns raised were:

- The approach may lead to **regional gaps in provision**:
  - Providers in rural or harder to reach areas, or those with funding or staffing challenges, may struggle to meet the OfS conditions.
  - Where providers do not meet conditions, they should have access to support and development to help them reach them, especially where provision is necessary ensure student access or is in areas of strategic importance.

*“This approach has the potential to lead to HTE provision cold spots across England as it’s likely that institutions in metropolitan areas are more like to meet ongoing registration conditions (financial requirements) due to access to higher student numbers. It immediately creates a two-tier system, which does not support the Industrial Strategy social mobility targets. Some form of support to enable institutions that are financially or regionally challenged by the conditions, due to rurality, or where previous funding cuts have affected potential to meet requirements, would be needed to ensure no disadvantage occurs.”* Awarding body

- Providers will have to go through a **resource-intensive registration process** to gain access to the market. Where a qualification is already recognised and meeting the needs of local markets this could be seen as unnecessary. It may be more prudent to keep provider costs low, resulting in lower fees for students.
- **Students may be disadvantaged** if their local provider does not meet the conditions. This could have a disproportionate impact on learners who are less able to travel, e.g. disabled or economically disadvantaged students or those with caring responsibilities.
- Different student groups, e.g. those studying part-time, will have **different financial support needs** and may benefit from varying packages.
- Funding may be challenging for many high-quality, market-relevant qualifications if they are not approved.
- **Qualifications that do not map to occupational standards**, or where there are no existing standards or Route Panels, will not have a standard against which they can be approved.

### Driving quality and building capacity (20 references)

333. Those in support of the proposal felt that **it would make HTE more attractive** and would encourage providers to deliver high-quality courses that are responsive to local market needs.

*“Offering a more competitive student finance package for approved HTQs would underpin their quality and sustainability, as well as the reputation and credibility of technical and vocational education. Creating parity between technical HE and academic HE in the student finance packages would send a clear message that there is also parity in the value of those technical HE qualifications.”* Provider (HE)

334. Further, some respondents believed that those that did not meet the standard should not have access to the markets, particularly given the costs associated with registering.

*“Agree – there is a cost of registering for HTQs and providers who achieve the standard should have greater access to the market than those that do not. Indeed, those that do not should be excluded from the market.”*  
Professional/business organisation

### Encouraging take-up amongst students (18 references)

335. For those that supported the proposals, in addition to encouraging a high-standard of provision, it was felt that **it would make HTE more attractive for students**. A competitive funding package was seen to be an appropriate incentive to encourage students and ensure that costs are not passed on to them. In addition, it was felt to demonstrate the quality of HTE, which would itself help engender positive perceptions of technical learning and encourage uptake.

## More consultation or clarification required (39 references)

336. The consultation document set out that the detail regarding student finance packages was dependent on the conclusions of the Spending Review. As such, respondents felt that **further consultation within the sector would be required** once proposals were more clearly defined. In addition, because the proposal directly impacted students it was felt that they should also be consulted prior to decisions being made.

337. Respondents also asked for clarification in a number of areas:

- The definition and breadth of HTQs and the extent to which level 4/5 qualifications will be considered HTQs.
- How the “*competitive funding package*” would sit with existing funding arrangements, including Advanced Learner Loans, and the potential for simplifying the funding system.
- How indicators of quality and the funding received by providers will be defined and determined.
- The extent of providers’ responsibility to deliver skills required by local industry.

*“We would broadly agree with this statement, however this assumes that the definition of HTQs is sufficiently broad and accommodates local flexibilities necessary to support the development of a local workforce. A broad, national, definition that didn’t allow this local flexibility would force providers to decide between the financial incentive of the HTQs or delivering a qualification that met the needs of the local economy to the detriment of the providers financial health.”* Provider (HE)

## Feedback from consultation events

338. As with the online and email consultation responses, a key concern raised by event attendees regarding the delivery of HTE related to regulatory processes. There was general consensus that there was risk of duplication in an already rigorously regulated system and that implementing additional processes could cause confusion and unnecessarily burden providers.

339. Funding for good quality, experienced teaching staff, as well as appropriate and up-to-date facilities and equipment were also raised as issues for the delivery of HTE, especially for smaller providers.

340. There was limited discussion regarding requirements for additional support at the consultation events. Where there was feedback, attendees focused on the need for awareness raising amongst and support engaging with employers, including good-quality IAG and mechanisms for networking and sharing good practice across providers (e.g. workshops and online resources).

## D: Student and employer demand

### Summary

Respondents were asked in this section about the need for more people to undertake HTE, the profile of HTE, IAG and other measures to improve access and student support.

### Need for more people to undertake HTE

**A large majority of the cohort (93%) agreed 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.** The areas most frequently discussed were:

- **The skills gap and the challenges faced**, such as the need for new skills as key sectors evolve, and the low levels of training for both young people and adults.
- **Raising awareness and better IAG** so young people can navigate the proliferation of options and career pathways.
- **Older adult learners.** Some respondents outlined issues relating to demand among older adult learners. It was stated that this was high, often through employer routes.
- **Barriers** for learners on lower incomes, in receipt of benefits or in low skilled work.

### Profile of HTE and IAG

**Most respondents (95%) agreed with the measures set out to improve the profile of HTE.** Ideas regarding how to improve the profile of HTE focused mainly on the provision of careers IAG, the role of employers and professional bodies in promoting HTE, and the provision and promotion of technical education in schools.

**A large majority of respondents (91%) agreed with the measures proposed to improve IAG for young people and their teachers, adults and employers.** Suggestions for ways in which the HTE information gap could be filled for different groups included:

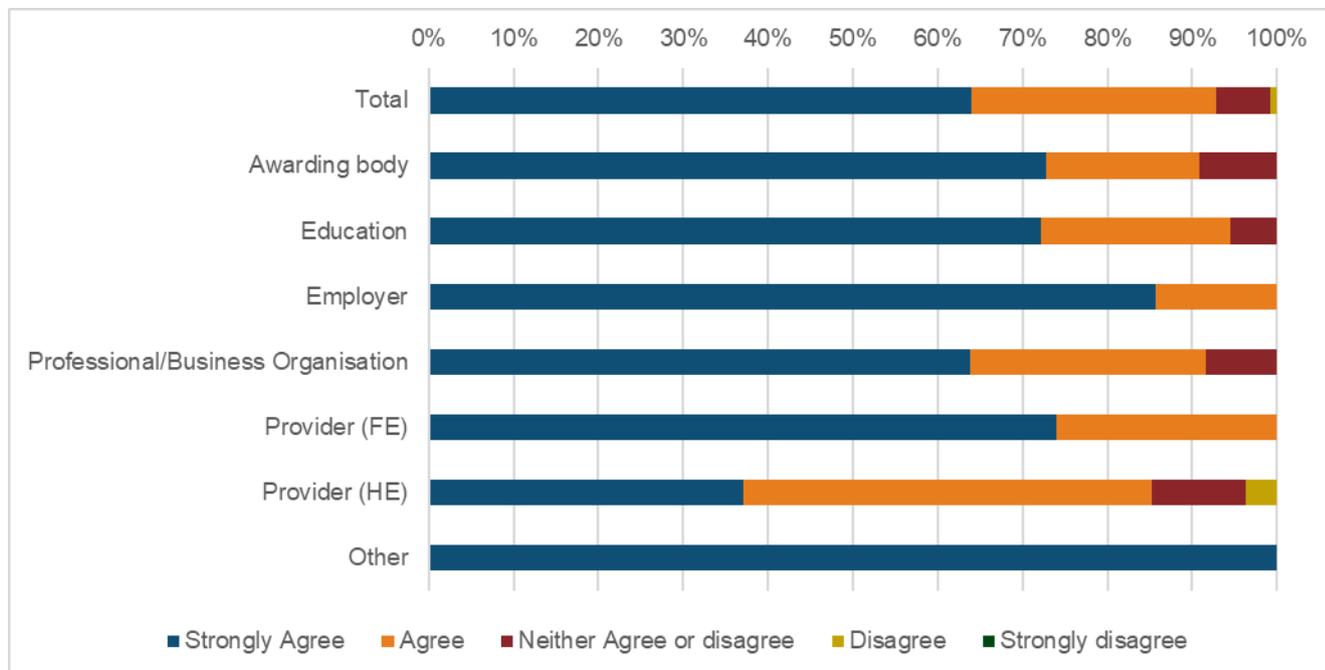
- **Young people, parents and teachers:** the provision of quality IAG and career pathways; the need to specifically target parents and teachers as well as young people; and, improving approaches to promotion and marketing to young people.
- **Adults:** improved promotion and marketing to adult learners; the need for flexibility (e.g. part-time study, modular approaches and timing of courses); and, encouragement for employers to promote re-training opportunities to their workforce.
- **Employers:** engaging trade or professional bodies; targeted promotion and marketing of HTE information to employers; and, developing employers/providers links.

### Access and student support

Other ideas to improve access and support students included **promoting accessibility and/or flexibility**, e.g. for minority or vulnerable groups and **ensuring effective pastoral and academic support** for learners.

## Question 23. 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?

Figure 20: Question 23. (n=125 responses)



Source: York Consulting quantitative analysis, 2020

341. There were 125 respondents to Question 23 (93% of all respondents). Figure 20 shows that a large majority of the cohort (93%) agreed there is a need and opportunity for more young people and adults to be undertaking HTE in the future. Over three out of five respondents stated that they 'strongly agree' with the statement. There was only one respondent that disagreed with the statement, this being a HE provider.

342. A total of 142 qualitative responses were provided to Question 23. Responses were coded to 11 themes. The areas most frequently discussed were in relation to the 'skills gap', a need for upskilling in specific technical areas, and for requests for greater clarity around raising awareness of HTE. Although all of the respondent types expressed views in relation to skills gaps there was slightly more discussion of this among ABs and professional/business organisations. Professional/business organisations provided a greater volume of responses in relation to awareness raising, while provider groups were more likely to address issues faced by older adult learners and the need for an embedded CPD culture. Each of the themes are outlined below.

### The Skills gap – upskilling in specific areas (63 references)

343. Respondents discussed the **level of technical skills in England**, the need for new skills as key sectors change and evolve, and the low levels of training for both young people

and adults. Many highlighted the need for more people to undertake HTQs. This is illustrated by the quote below.

*“According to the Resolution Foundation, over the last twenty years there has been a fall in 25-28 year olds who had recently started a science, research or engineering role without a degree, the proportion falling from 1/3 to 1/5. However, the amount of those with a degree (or equivalent) has held flat at 45%. This is clearly indicative of a skills gap at intermediate level among younger people. Equally, mature students are not making up the shortfall and their numbers actually fell by 20% from 2011 to 2017, according to Million+.”* Professional or business organisation

344. Specific areas where skills gaps were identified by respondents included:

- For employers adapting to new technologies or responding to new commercial opportunities.
- The STEM sector.
- IT.
- Construction.
- Advanced Manufacturing.
- Energy and Environmental Technologies.
- Creative and Digital.
- Health and Social Care.
- Finance and Professional Services, including business and accounting.
- Visitor Economy.

345. Increases in the demand for higher technical skills were often mentioned. Respondents felt that employer requirements were not likely to be met on current trajectories.

*“The 2017 CBI/Pearson Education and Skills survey of 500 employers employing over 3 million people found that three quarters of businesses (75%) expect to have more job openings for people with higher-level skills over the coming years while just 2% expect to have fewer. Well over half of businesses (61%) are not confident there will be enough people available in the future with the necessary skills to fill their high-skilled jobs.”*  
Awarding body

346. Some respondents felt that the HTQs would not on their own address the skills gap. Reasons given for this included the following:

- Meeting skills demand will need sufficient staff capacity and support for employer delivery.

- There is a need for lifelong learning e.g. CPD, and opportunities for existing workers to upskill and retrain to reflect rapidly advancing technologies (e.g. AI and increasing automation) and the digital sector.
- Training in technical skills needs to be tailored to meet local employer needs in different areas.
- In some industries at risk of displacement, level 2 and 3 skills may need to be put in place first and before progressing to HTQs.
- Skills gaps at levels 6 and 7 e.g. computer programmers, engineers and graphic designers will not be addressed by HTQs.

347. **The skills gap was seen to vary across sectors and across groups.** Specific mention was made of low-income workers ‘trapped’ in low skill jobs.

*“There is a pressing need to re-skill and improve social mobility of large tranches of lower income workers who become trapped in low skilled work that neither pays well nor delivers economic growth. The recent Greater London Authority analysis of skill requirements in London is a useful example of such analysis.”* Awarding body

348. Responses also outlined observations that some employers have chosen to recruit from abroad due to the lack of technical skills in the UK. Others reported that some employers have a larger proportion of their skills base retiring, which highlights the need for upskilling young people. It was also pointed out that transferable skills are needed as young people are likely to be changing career several times over the course of their working lives. It was noted that it will take some time to build up the skilled workforce required to meet future demand.

### **Raising awareness and better IAG (33 references)**

349. There was a **perception that there is a proliferation of options and career pathways for young people** and that clear and consistent guidance is therefore required. This is illustrated by the following quote.

*“Lack of clear guidance can also act as a barrier to access. For many 18-year-olds, the on campus 3-year degree is the only option they are presented with. This has led to a position where a 3-year university education is often portrayed, and perceived, as the only route available, and the only route of ‘value’ (the ‘degree or bust’ perception). For many, this route will meet their needs and ambitions. For many others however, it will not. For others, the assumption that this is the only option, will deter them from further study either because university is ‘not for them’ or the model on offer is not flexible enough to meet their other commitments.”*

350. It was stated that both schools and employers need to be more aware of HTQs and have them ‘demystified’. Some felt that children needed to be introduced to these at an earlier

stage in their education and that schools need to be encouraged to not solely focus on traditional qualifications.

351. Raising awareness, it was argued, will depend on the provision of good careers advice that supports well informed choices and career pathways matched to individual learners. Some respondents noted that the use of 'levels' terminology denotes a hierarchy and suggested using alternative terminology.

*“Adopting the term ‘technician’ and promoting technical skills and qualifications will help move away from the unhelpful language around ‘levels 4 and 5’. Our experience is that both students and employers perceive ‘levels’ as hierarchical which reinforces the belief that level 6 is superior.”* Professional/business organisation

352. Improvements in both the awareness and understanding of HTQs was seen to be crucial in driving demand among both students and employers. Teachers, it was noted, are graduates and therefore have not generally had experience of technical education themselves. This was felt to contribute to a perception that technical routes are second to degree options.

353. Some respondents felt that awareness of both T Levels (starting in September 2020) and HTQs needed to be raised and embedded to ensure that HTQs offer a natural progression route for learners completing T Levels.

#### **Older adult learners (18 references)**

354. Some respondents outlined issues relating to **need and demand among older adult learners**. It was noted that the demand among older learners for level 4 and 5 courses was high and often through employer sponsored routes.

355. The availability of funded and flexible provision was seen by respondents as being beneficial for this learner group.

*“Flexible and well-funded mid-career learning, clearly signposted to potential career enhancement or change of career, is potentially a significant positive outcome of this initiative.”* Awarding body

356. One respondent (professional or business organisation), who had undertaken a consultation, reported that students did not express concerns about the lower representation of young people in technical education. They felt that rather than enter into technical education at 16-18 years, it would be better for young people to take up technical routes once they had made their career choices.

357. Other responses discussed that an emphasis on encouraging younger people to enter technical education could deter older learners. This caused concern, as lower levels of qualifications among some older adults (with the highest qualification at level 3) was seen to evidence the need for them to be treated as a priority group.

*“The need is most acute with adults. There are approximately 20 million adults in work with level 3 as their highest qualification and therefore this is the key priority group.”* Professional/business organisation

358. HTE for older learners was also felt to be important in helping employers meet future technological developments and enabling adults to make up for missed learning opportunities earlier in their lives and switch careers.

### **Barriers to undertaking the (15 references)**

359. Some responses addressed **barriers to HTE** making particular reference to potential learners that are on lower incomes, in receipt of benefits or in low skilled work. In particular, respondents referred to students having to arrange their own work placements, the interaction of training opportunities with Universal Credit and geographical cold spots. Some outlined that HTQs had the potential to be ‘an engine for social mobility’ if these barriers can be successfully overcome.

360. Other respondents made reference to specific barriers for older adults, or young people who are deterred by concerns about costs. Respondents thought that:

- A lack of flexibility, particularly for older learners, including the need to stop and then restart learning could prevent people from undertaking HTE.

*“Equally important is the need for flexibility of delivery methods and being able to stop and restart study. Due to many of our students having personal commitments and the lack of experience of HE within their family, their studies and attendance often do not take priority. It is therefore important to have flexibility in order for them to succeed.”* Provider (FE)

- Flexible financial support would support learners of all ages looking to undertaking HTE.

*“A further barrier to access for 18-year-olds, and adult learners, is a lack of flexible financial support at all levels of provision, which would allow them to progress through a ladder of learning, scaffolding their learning, in a manner flexible enough to fit with working and family lives.”* Awarding body

### **The impact of cultural and wider social contexts (11 references)**

361. Cultural and wider social issues discussed by respondents focussed on **perceptions of technical education and future social challenges**. The main issues raised were that:

- Those in low-income groups are often ‘trapped’ in low skilled work.
- The jobs of those in lower socio-economic groups are more likely to be at risk as a result of future changes and challenges e.g. automation. It was argued that this makes it even more important that people from these groups can access HTE opportunities.

- Technical education is viewed by the public in a less positive light than 3-year undergraduate courses, which universities tend to promote. As such, the need to raise the status of technical education opportunities was highlighted.

362. For some, a 'cultural shift' would be required to support a more positive perception of technical options – as illustrated by the quote below.

*"[The organisation] believes there is a chronic need for a wider cultural and societal shift to alter the perception of technical and vocational education in the population, particularly among parents, guardians and teachers. Such a change would help to advance social mobility by bolstering the number of people taking the higher technical route."* Professional/business organisation

### Provision of practical learning (8 references)

363. Respondents discussed the **practical learning component of technical education**. Respondents mentioned the need for exams and academic pathways to not be seen as the only route, and that practical and technical knowledge should be given greater emphasis and importance. It was noted that the practical elements of technical courses may require additional training and/or investment and a view was expressed that school-based Design and Technology provision fails to provide students with the right practical skills for technical careers.

*"Design and Technology in schools does NOT provide pupils, with the practical manufacturing skills, required for them to reach high level skills at FE."* Education

### Support and resources for technical subjects in schools (8 references)

364. Respondents felt that **additional funding is required for HTE** and that there should be parity of funding for technical and academic courses. One respondent linked historic changes in funding (e.g. the introduction of loans) to declining participation in further education.

365. There was discussion of the situation in schools. The view was expressed that there should be more support for young people to consider technical careers while in school through improved IAG. One response stated that school performance measures are more focused on the progression of young people into university – preventing parity of esteem.

*"Currently, performance measures in schools place a greater value on getting student into university than into further or vocational education. This encourages schools to push pupils away from HTE at a time when parity of esteem between the two are critical for the success of the new HTQs. This is something that ... [Professional Institutes]... will be able to help with by voicing the value of HTQs through our channels. For HTQs to*

*be a success we also feel that there needs to be parity of funding for the students, so learners from any background can consider HTQs alongside their other options.” Professional/business organisation*

### **Encourage an embedded CPD culture (7 references)**

366. A few of the responses addressed CPD. It was stated that **effective upskilling and retraining required CPD to be in place** and it was also noted that the provision of HTE should not displace CPD provision by employers. It was suggested that professional associations could have a role in providing CPD. There was also one response outlining the important role of older employees sharing their knowledge and skills with younger and less experienced workers.

*“At [name of employer], we are passionate about retraining and utilising the skills and knowledge of what may be deemed the older generation. We have a Learning and Development facilitator who has worked in traditional construction for many years, who is 62 years old, and now imparts his knowledge to our new starters through aligning them to how we build modern modular homes. Adapting to a changing industry will be much more feasible with the support and offering of qualifications in line with employer needs.” Employer*

### **Encouragement for career development (7 references)**

367. The role of HTE in encouraging career development and progression was discussed. It was highlighted that **skills should be transferable** as today’s young people may make career changes across their longer working lives.

### **Other comments (34 references)**

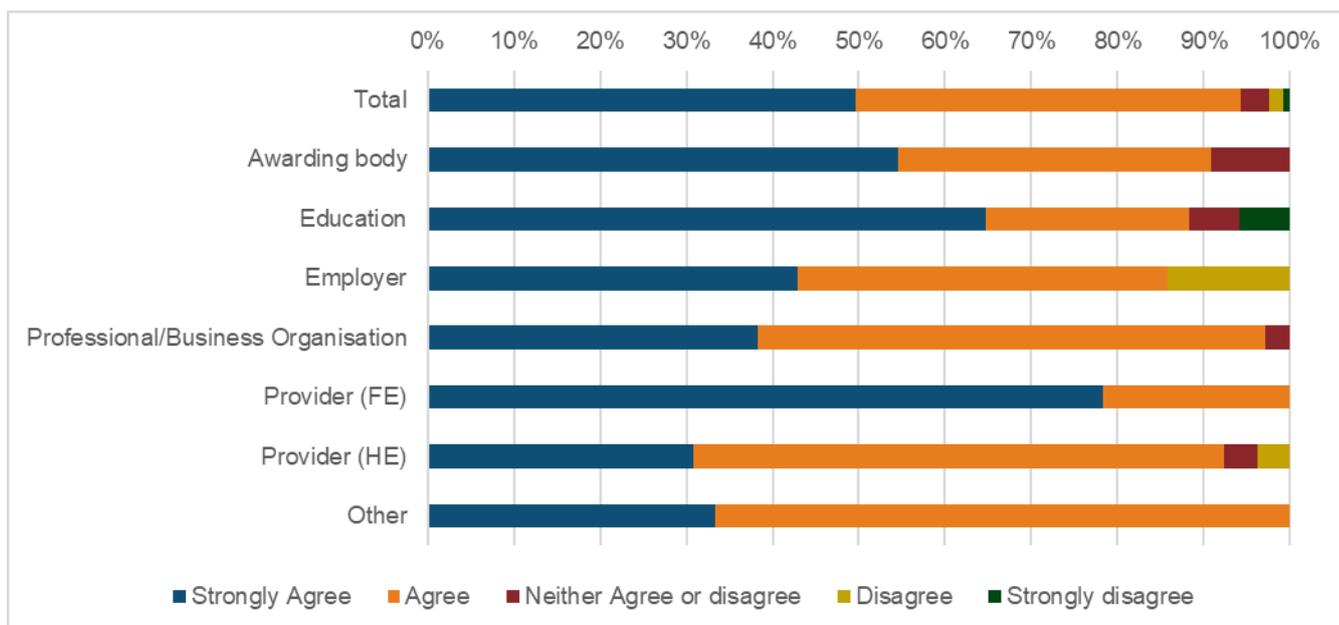
368. Respondents raised the following other issues in response to this question:

- HTE provision needs to be reflective of student demand.
- Existing professional qualifications that are already mapped to occupational standards by professional bodies should not be ignored.
- There is a need for further discussion around what further and higher education are for and the benefits beyond employment prospects and wage returns. For example, improvements in health and wellbeing, civic participation and reduced involvement in crime.
- The importance of pastoral support for HTE learners needs to be recognised.

## Question 24. To what extent do you agree or disagree with the proposed measures to improve the profile of HTE?

369. The **measure proposed to improve the profile and prestige of HTE** were in summary: ensuring that HTQs have a clear product identify and are promoted through a campaign; giving HTQs the recognition they deserve in school and college destination measures and amongst employers; and harnessing the prestige of high-quality providers and professional bodies to promote HTE.

**Figure 21: Question 24. (n=121 responses)**



Source: York Consulting quantitative analysis, 2020

370. The number of respondents to Question 24 was 121 (90% of all respondents). Figure 21 shows that 95% of respondents agreed with the measures set out to improve the profile of HTE. Half of the respondents stated that they 'strongly agree' with the measures and only 3 of the respondents disagreed.

## Question 24. Please provide any additional ideas

371. There were 140 text responses to this question. Ideas regarding how to improve the profile of HTE focussed mainly on the provision of careers IAG, the role of employers and professional bodies in promoting HTE, and comments about the provision and promotion of technical education in schools. Other ideas were about funding, the complexity of technical routes and the need for government support.

### Improve provision of quality IAG and promotion of technical education in schools (37 references)

372. Respondents discussed a **need for improved careers IAG** underpinned by more investment, training and awareness raising.

*“Information, advice and guidance in the school system needs to improve and needs to be better enforced as there is a lack of awareness on the benefits of apprenticeships and technical education. This route needs to be considered as prestigious as the A level and traditional university routes. That said, it is important to recognise that university routes are now more diverse than ever and encompass apprenticeships and the provision of many technical and vocational qualifications. Information, advice and guidance needs to reflect better that the notion that academic or technical pathways are incompatible alternatives is not only out-dated but is holding back progress towards equivalence of prestige.”* Professional/ business organisation

373. **Investment was felt to be important both to improve the quality of the information being provided** and to ensure that HTE is given sufficient prominence. It was also stated that for this be successful there needs to be a clear focus not just on young people, but also on parents and teachers. As such, training needed to be put in place to ensure that messages are consistent and that young people have greater clarity regarding the different career routes and pathways that they can choose.

374. Effective awareness raising was also seen as crucial in the creation of technical education opportunities and it was stressed that training opportunities needed to be matched to employers’ skills requirements. Harnessing the experience of students who have already chosen a technical career was seen to be valuable in this regard.

*“There are also non-government funded schemes ... which seek to present compelling and clear information on opportunities which young people and those advising them may not be familiar with. [The organisation] is keen to ensure that [such schemes] play a positive role in raising awareness of HTQs.”* Professional/business organisation

375. Some respondents felt that there was a need to address perceptions and promotion of technical education in schools, e.g. by engaging with learners at a younger age.

*“Presently, within FE, technical education has poor status and whilst within certain sectors, technical qualifications carry currency and high status, this isn’t always known within HEIs and colleges. Improving prestige of HTE and FE in general should be targeted at younger prospective learners to ensure they have a clear idea of what educational pathway they need to take in order to get the career they want.”* Provider (FE)

376. Respondents also saw a need for clear messages about HTQs, how they are aligned with other higher education routes, course content and career opportunities. This, it was

argued, could be achieved by ensuring there are strong links with schools and that the Gatsby Benchmarks for 11 to 18 years are used for careers IAG in schools.

377. Furthermore, there was a view that school targets and awards needed to be adjusted to reflect and acknowledge technical routes and not just the academic route from A Level to university degrees. In addition, it was suggested that those students electing to do the forthcoming T Levels should be specifically targeted for HTQ-related information and advice.

### **Promotion by and links with local employers, industries or professional bodies (21 references)**

378. Respondents considered the involvement of employers in the development and promotion of HTE as critical. **Employer commitment, it was argued, would help to create a demand for HTE** and promote their credibility.

*“We think the endorsement/quality assurance behind HTQs is OK, but it is more important that the whole of HTE gets promotion as it is poorly understood and recognised compared with HE (as uptake figures show). Also, collaboration with professional/skills bodies like [organisation] could be a short-cut to gaining support and acknowledgement from employers.”*  
Professional/business organisation

379. The role of professional bodies in raising the profile of HTE was also discussed. One respondent felt that the consultation had overlooked this. It was noted that building links with professional bodies e.g. Design and Technology Association or the Dental Technologist Association, would help with the provision of advice and support to learners and for the on-going review and revision of HTQs.

380. Some of the responses outlined how links with employers might be supported. Suggestions included:

- Appointing local champions for HTE who could liaise with employers.
- Having ambassadors from industry.
- The direct involvement of local and regional employers.
- Involving professional bodies in bridging the gap between employers from key sectors/industries and technical education providers.

381. All of the respondent types made reference to the need for links to be built with local employers and professional bodies, but this was mentioned to a greater extent by professional/business organisations and by providers.

### **Funding and value for money (10 references)**

382. Some respondents stated that **funding needed to be in place for learners choosing HTQs** and that longer-term investment would be required for HTE to gain sufficient recognition, and a high profile.

*“Adequate resources will need to be committed over a long period of time to address and correct established attitudes.”* Provider (FE)

383. Specifically in relation to IAG, however, one respondent considered that investment was already in place to ensure information provision and awareness raising.

*“The government has already put a lot of support for good career guidance in place and this is mentioned in the proposals. It should not therefore require significant additional investment to ensure that key organisations are provided with good information that they can cascade through their activities.”* Professional/business organisation

### **Comments about complexity, bureaucracy (5 references)**

384. A small number of comments were made that **cautioned against further complexity** and/or an increased level of bureaucracy as a result of reforms to HTE. The value of the proposed kitemark or brand was discussed, specifically how it might fit with existing and more established brand names, and the potential to create more complexity and confusion among employers, parents and students. People, it was stated, would need to be able to differentiate between HTQs and apprenticeships, traineeships, and T Levels or other vocational qualifications.

### **Explicit government support (4 references)**

385. It was noted that university degrees have a strong brand and that government level promotion and explicit support would be required to demonstrate the value and comparability of HTE.

*“We believe that presenting HTE as an alternative to higher education would be a mistake. Instead, demonstrating that HEIs are engaged in the delivery of HTE and that HTQs can be awarded by HEIs and can lead to bachelors’ degrees will help in raising awareness and acceptance levels among parents and schools.”* Awarding body

### **Other comments (22 references)**

386. Over and above comments outlining general support for raising the profile of HTE, a number of additional points were raised:

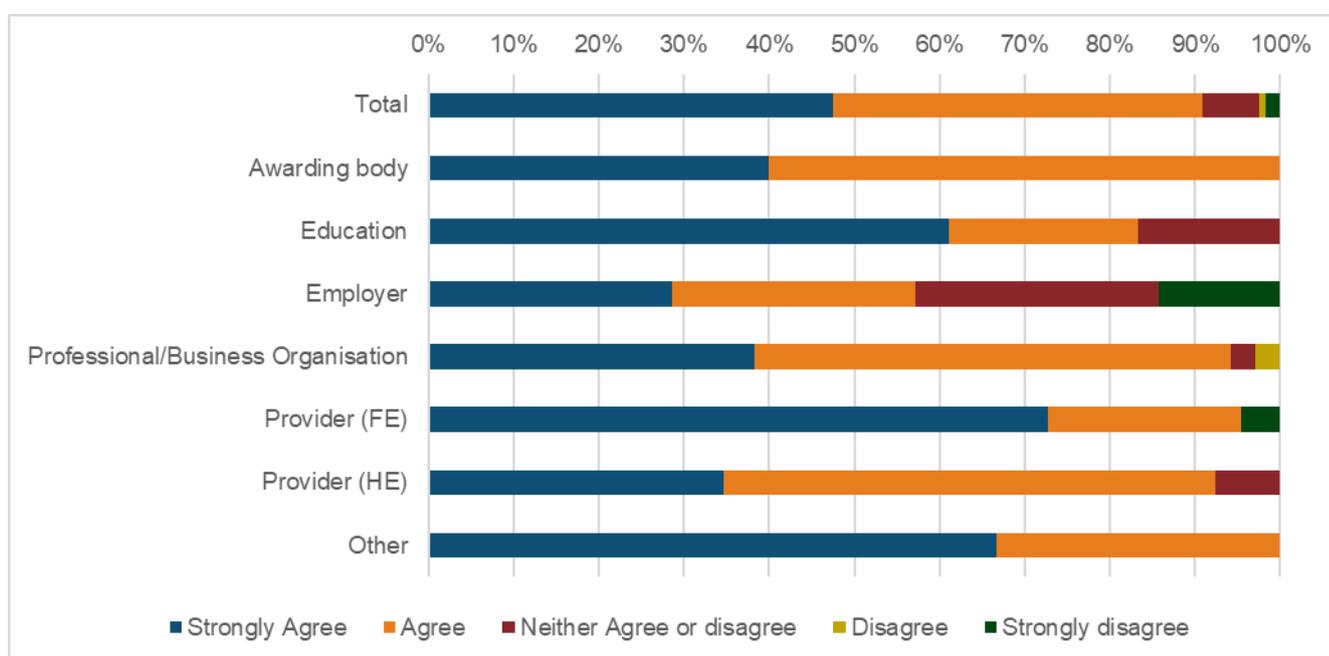
- Further research with students, employers and professional bodies is needed to better understand approaches to raising the profile of HTE.
- Consideration should be given to expanding the role of Universities and Colleges Admissions Service (UCAS) to provide information about study options other than degrees.

- Two respondents discussed a need for consideration to be given to the international profile of HTE, specifically with regards to transferability and the reputation of these qualifications in other countries.

### Question 25. To what extent do you agree or disagree with the proposed measures to improve IAG for young people and their teachers, adults and employers?

387. The **measures proposed to improve IAG** were, in summary: for young people and their teachers, working with the Careers and Enterprise Company, Career Development Institute and UCAS to develop measures for IAG; for adults, working with the National Careers Service and professional bodies; and, for employers, by working with LEPs, Growth Hubs and the National Apprenticeships Service.

**Figure 22: Question 25. (n=120 responses)**



Source: York Consulting quantitative analysis, 2020

388. There were 120 respondents to Question 25 (90% of all respondents). Figure 22 indicates a similar response to Question 24 in Figure 21, with 91% of respondents agreeing with the proposed measures to improve IAG. Likewise, as per the responses to Question 24, only 3 out of the 120 respondents disagreed with the proposed measures.

### Question 25(a). In what other ways could we help fill the HTE information gap for: young people and their teachers.

389. There were 139 text responses to this question. There were numerous references to the provision of good quality careers IAG and/or career pathways, the need to specifically target parents and teachers as well as young people, and comments about approaches to promotion

and marketing to young people. Across the respondent types providers and professional/business organisations were more likely to focus on these themes. A smaller proportion of references were made about links with key stages and with employers, the cultural context for technical education, and a need to change the mindset of key influencers.

### **The provision of good quality careers IAG and career pathways (39 references)**

390. Many respondents felt that there was a **need for greater focus on, and more consideration of, careers IAG**. It was seen as critical in determining perceptions of HTE and its take-up. Many felt that there was a need for clearer, easy to understand career pathways and clarity regarding different routes and different qualification levels.

*“There is a clear need to improve IAG for all the above groups with the specifics around HTQs. This must not be in isolation however and needs to reflect the whole apprenticeships and technical education landscape outlining progression routes, alternative pathways and career benefits. Local regions do have a key role to play here for all 3 groups, building on the work underway with schools and colleges through CEC [Careers and Enterprise Company] to strengthen and tailor messages to all audiences.”*  
Professional/business organisation

391. Many felt that careers that meet employer skills needs should be promoted, including through destination data to inform young people’s choices. Respondents also thought that careers advisers should have the appropriate qualifications and training to deliver effective provision of IAG, with one respondent stating that IAG should be subject to compulsory inspection to ensure high standards.

392. Some respondents outlined their suggestions or experience of useful approaches to information provision for young people. These included the following:

- Professional bodies offering advice and information.
- A network of HTQ Ambassadors, Professional Ambassadors or mentors.
- The dissemination of HTQ information through large employer/professional websites e.g. the Health Careers web-site, or through university outreach work.
- A need for information that is clear, accessible and engaging for young people.
- Utilising community outreach to support IAG e.g. with theatre and the creative arts.
- Greater time and investment in IAG.
- HTE learners sharing their own experience of technical education with young people.
- Better targeting of pupils to support access to technical career pathways.
- The use of the Gatsby Benchmarks for structuring IAG.

## Target parents and teachers (36 references)

393. A large proportion of the responses made reference to a **need to target parents and teachers in order to fill the HTE information gap** for young people. There was discussion of parents being a key target group as they are seen to have a strong influence on young people and to be a source of trusted information. It was suggested that materials could be developed for parents, and that they could be informed through opportunities to attend careers information events. There were some concerns regarding negative parental attitudes and perceptions of technical education that it was felt needed to be overcome.

*“One of the main issues I see when we undertake STEM visits to schools is parent prejudice. Parents influence their children heavily in what career to take and it’s their ignorance of technical skills/jobs that sometimes prevent children from following these routes. I still come across parents who think engineering is dirty and not for girls and yet in reality my engineers sit in a lovely office designing advanced control systems and earn big 5 figure salaries.” Employer*

394. Teachers were also viewed as an important source of information for young people and, as with parents, were considered influential in terms of their career choices and decision-making. Respondents outlined a number of issues and/or considerations relating to teacher training/CPD and parental awareness:

- Careers advice should be included as part of teacher training. A few respondents felt that this should be compulsory.
- Teachers’ knowledge of technical education options should be fully up to date, with a joined-up approach regarding awareness of the forthcoming T Levels for teachers and employers.
- A campaign to promote HTE may be necessary, in part because teachers, parents and employers may be more likely to promote career options of which they themselves have had experience.

## Promotion and marketing to young people (26 references)

395. There were many references to the **promotion and marketing of information** about HTE specifically to young people. Discussion centred around a need for making more information available, raising awareness, and increasing levels of understanding among young people.

396. It was felt that information provision for young people and messages from government should be consistent. HTQs needed to be clearly labelled across both schools and colleges and emphasise the financial support available to students. One respondent cautioned that there was a risk of ‘information overload’.

397. A range of approaches for bridging the HTE information gap with young people were offered:

- Using social media and videos.
- Careers events.
- Talks to young people from skilled professionals.
- The provision of work experience.
- Community based information provision e.g. promoting HTQs to community theatre groups.
- Clear and relevant case studies.
- A national campaign.
- Online information that supports the 'mapping' of technical career pathways.

### Clear links at KS2-KS4 to HTE (22 references)

398. Some of the responses outlined a view that **technical careers should be promoted to children and young people from a younger age** (e.g. age 14 or below). The view that primary schools should address this was expressed, with one respondent cited evidence that decisions made at the age of 10 years can be crucial.

*“Any approach must target awareness at the early stages of secondary education or earlier. Decisions about whether to go onto higher education even at age ten are predictors of their decisions later in life (see UCAS’s 2016 report, “Through the lens of students: how perceptions of higher education influence applicants’ choices”). Early intervention is vital for HTQs to be recognised by prospective students as a viable option.”*  
Provider (HE)

399. Other respondents felt it was important to target those not considering university degrees to support them in envisaging a career for themselves beyond levels 2 and 3.

400. It was also felt that better support for Design and Technology in schools would help to establish practical skills that could be transferable and relevant for future technical education. Some argued that schools tend to focus on A Level choices rather than the wider range of study options available to young people.

### Improved employer links (19 references)

401. Some respondents expressed the view that **schools and employers need to link up more** to ensure quality careers IAG is provided. It was suggested that employers, representative organisations (e.g. LEPs) and professional bodies, should all be incentivised and encouraged to link up with school to provide information and give talks to young people.

*“Encouraging and incentivising visits from employers and a variety of people within an occupational sector to classes, giving talks and showing*

*the different options one qualification might bring as future employment opportunities.” Education*

*“Encounters with employers and employees is highlighted as being a vital part of this best practice, with research showing that a young person who has four or more encounters with an employer is 86% less likely to be unemployed or not in education or training, and can earn up to 22% more during their career.” Other*

402. The value of work experience being in place for young people with employers was discussed, as was a need for funding to be put in place to support this. It was felt that workplace placements would help young people to better understand an industry or sector.

*“Work experience is another effective way to support students with the choices and better help them understand more complex (and often misrepresented) industries such as engineering.” Professional/business organisation*

403. It was stated that the benefits and value of work placements for both young people and employers should be highlighted and that building on existing programmes was the best way to promote this.

### **Cultural context and perceptions of technical education (9 references)**

404. The social context and culture for technical education was raised by a small number of respondents. Some pointed out that there was a **perceived social bias towards university degrees in schools**, with technical qualifications being regarded by some as second rate. As such, it was proposed that awareness and understanding of technical education needs to be increased.

*“However, even with the Baker Clause they do not go far enough in helping the system change an entrenched mind set about the role technical and HTQs have in having a successful career. Training and understanding needs to go further in terms of professionals really understanding the raft of existing and future qualifications and what professions they in turn support given the specificity of some of this.” Professional/business organisation*

405. It was also argued that it may be more appropriate to align technical and academic education and provide greater flexibility, as this would better reflect future employment needs.

*“Importantly, the positioning of higher technical education alongside ‘rival’ qualifications belies a perception of two separate academic and technical routes through education. This bifurcation of education into two channels*

*does not reflect the varied pathways that learners take throughout their lives and the role that many universities play in delivering technical education. If our education system is to meet the needs of the 4th industrial revolution a convergence and alignment of previously separated conceptions of 'academic' and 'technical' education is required. In the context of information and guidance it is essential to avoid presenting academic and technical learning as alternatives to choose between. [Provider (HE)] would prioritise communicating to learners how their education paths could progress and the flexibility that is possible in and between the routes they take – this could mean higher technical qualifications build on the strong brand recognition of A Levels, apprenticeships and degrees.” Provider (HE)*

### Other (13 references)

406. Other comments and suggestions made in response to this question have been included below:

- The need for further consultation with key stakeholders e.g. young people, teachers and employers.
- Provision of an enhanced role for providers in the delivery of careers IAG, rather than the use of intermediary organisations.
- Making use of IoTs to promote HTE to young people and their teachers e.g. via careers events.
- The need to ensure that career advisers are fully informed about funding and assistance that would be available for disabled young people.
- The implementation of a centralised application and search system.
- Evaluation of the effectiveness of new measures to fill the HTE information gap.

### Question 25 (b). In what other ways could we help fill the HTE information gap for: Adults

407. There were 130 text responses to this question. Most of the responses were focused on the need for and approaches to targeted promotion and marketing of HTE information to adult learners.

#### Targeted promotion, marketing and IAG (58 references)

408. The **need for greater levels of information, encouragement and incentives for adult learners** were all discussed by respondents. It was proposed that approaches for filling the information gap could emphasise the likely earnings from HTE careers and also be linked to local labour market information and skills demands. A few respondents mentioned that HR departments could have a role in providing information to adults in the workplace.

409. It was noted that adults may be unaware of the technical education offer and, as such, would benefit from specific and targeted promotion and marketing. It was suggested that a dedicated and funded adult careers service is required and that the duplication of information across different organisations should be avoided.

410. One respondent noted that approaches to communicating and raising awareness of apprenticeships among adults could inform the approach for HTE. It was also suggested that adult learners could be given encouragement and incentives to take up work placements and work experience opportunities.

*“Encouraging and incentivising visits from groups of adult learners to the workplace so they have a first-hand (brief) experience of what their learning might lead to. Learners should be given the opportunity to see a variety of jobs within one occupational sector.”* Education

411. Various approaches to communicating information and promoting HTE to adults were suggested:

- A national media campaign and the use of digital communication platforms to create a simple and clear message e.g. through social media, websites and emails.
- Provision of an HTQ helpline, as well as information in job centres, libraries, council premises and through career days/events.
- Case studies based on adult learner journeys.
- Targeting key groups of adult learners e.g. Universal Credit claimants.

412. It was also felt that there are opportunities to harness key sector networks and professional bodies in promoting the benefits of HTQs to adults. Businesses and relevant employers could be given a key role in promoting technical occupations and employment opportunities available to adult learners. Marketing and communication ideas linked to employers included promotion directly by employers and working with trade unions, local authorities, Department for Work and Pensions (DWP), local charities and churches.

### **Need for flexibility (7 references)**

413. The issue of **flexibility in relation to adult learners** was a recurring theme. This included flexibility in relation to part time study, a range of options or pathways, modular approaches and the timing of courses to accommodate family and personal circumstances. It was felt that study may need to fit around existing work patterns (including shift work) and that the location of provision could also be important for adults.

*“For adult learners undertaking HTE, flexibility in learning modes and course times are crucial – these need to be in place and promoted to learners to show that study is viable around other commitments, which could include full or part-time employment and caring responsibilities. HTE*

*should be included within careers advice as part of the range of progression pathways available to Londoners.” Other*

414. The view that financial assistance may be important for overcoming the barriers adults face in taking up technical education opportunities was expressed. This, and a lack of the flexibility requirements outlined above, were cited as reasons for adults choosing to not take up training opportunities.

*“In UUK’s work on flexible learning in 2018, a survey of those who considered but ultimately decided against studying part-time found that after financial reasons, the next most common reason for not studying was that the course would not have fitted in with their personal life or employment situation.” Provider (HE)*

### **Support for industry or employers (4 references)**

415. Encouragement for **employers to promote re-training opportunities** to their workforce was mentioned by a small group of respondents. It was felt that employers could be better supported to understand the value of investing in a fully qualified workforce. Changes and actions within the workplace could then help to support adults to re-train. These included adjustments to working hours (e.g. move to part-time), promotion of the benefits of re-training/upskilling to the workforce, and funding for employees to take up training opportunities.

*“Promote the benefits of retraining and upskilling and incentivise employers to encourage their staff to upskill (monetary and time) in order to progress either inside or outside of their organisation.”*

Professional/business organisation

### **Other (10 references)**

416. Some additional comments and suggestions were made, including:

- Making available schemes for adults to access learning/training regardless of prior levels of attainment.
- The provision of a title (e.g. Technician) to promote credibility and recognition of HTQs.
- A need for further consultation among students.

### **Question 25 (c). In what other ways could we help fill the HTE information gap for: Employers**

417. There were 128 text responses to this question. Many of the issues and concerns outlined in relation to 25 (a) and (b) were also given in response to this question.

Professional/business organisations and providers particularly focused on engagement with

trade or professional bodies and targeted promotion and marketing, with professional/business organisations also citing the need for employer involvement.

### **Engage trade or professional bodies (19 references)**

418. Many of those who responded to this question outlined the **need to communicate and engage with trade and professional bodies**. Specific organisations were mentioned including: Chambers of Commerce, LEPs, the CBI and Make UK. This engagement, it was argued, would help to build partnerships and to ensure that skills shortages are addressed.

*“Employers’ skills shortages at higher technical level could be addressed through the local partnerships and activities, such as Local Enterprise Partnerships and Skills Advisory Panels, that could act as mechanisms to build relationships between providers and employers. Such relationships could inspire or encourage employers to contribute to the content of higher technical qualifications and upskill their existing employees through the providers on the Panels.”* Professional/business organisation

419. Engaging and building relationships with employers and professional organisations was also seen by respondents as a means to provide opportunities for employers to contribute to the course content of HTQs. Sector and trade bodies were regarded as having a role in promoting changes to HTE, and it was suggested that some public sector bodies (e.g. the NHS and local authorities) could be involved, particularly at the early stages, in promotion and awareness raising.

420. It was also proposed that information should be directed at recruiters (to ensure that they fully understand the value and benefits of HTQs and have the confidence to use the term ‘higher technician’ alongside ‘graduate’ in job adverts and job descriptions) and that raising awareness of HTE could be helped by encouraging business to incorporate HTQs as a required qualification.

*“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.”* Professional/business organisation

421. One respondent proposed reinstating the Education Business Partnerships with local authorities, and others discussed the value of engaging employers in the development of HTE case studies.

### Targeted promotion and marketing (16 references)

422. The view was expressed that **employers would benefit from a targeted approach and more information about HTE**, including details of what the qualifications look like and how they are delivered. It was proposed that this could focus on representative bodies and other business organisations.

423. The methods of promotion to employers were similar to those suggested for young people and adults, including:

- Posters.
- Media campaigns.
- Employer engagement activities.
- Case studies.
- Web-based information resources.
- Conferences and seminars.

### Employer involvement (15 references)

424. Some of the responses focused on the **involvement of employers in the development of HTQs**. How they could be involved was discussed and suggestions included: agreeing career pathways, writing occupation standards, involvement in the provision of study options, attendance at roadshows/presentations about HTE, accreditation of qualifications, and the design of the qualifications.

425. It was suggested that sharing experiences and stories from local businesses could be a useful element of technical training. Some responses outlined the view that employers should be given a more leading role in technical education, or that the government should encourage and support communication and collaboration between different employers or sectors.

### Provide links with learning providers (15 references)

426. A small proportion of respondents to this question discussed **links between providers of HTE and employers**. Issues raised focused around approaches to the delivery of training and comments on, or approaches to, such links.

427. It was noted that it would be useful for providers to have direct experience of employers and vice versa. This was one of a number of approaches relating to effective collaboration and joint working that were raised. It was felt that employers who considered that training providers were effective in meeting their skills needs were more likely to engage with these providers, but it was recognised that this may be more challenging with SMEs.

*“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.” Professional/business organisation*

428. A need for flexibility in relation to the delivery of training was raised. This included the suggestion that employers could provide a training location alongside providers, which would be particularly useful for smaller employers.

*“The current suggestion that training should take place within the classroom as a taught programme may discourage smaller employers from committing staff to HTQs. Greater flexibility to allow people to complete training either in the classroom or within a work environment should be considered, alongside the effective communication of this flexibility to employers.” Professional/business organisation*

429. There was also a view that employers needed clarification on how HTQs and degrees compare and interact.

*“Clarifying the link between the equivalence of the level of the HTE and the capacity of a holder of such a qualification to be able to operate at the level they require is therefore important. It may also help too point out the opportunity to top-up a HTE to a degree if deemed essential.” Provider (FE)*

### **Financial incentives (6 references)**

430. Respondents raised the **need for additional funding** and related information to support employer engagement, including:

- Financial support for liaison with key employer organisations e.g. LEPs.
- Incentives and/or funding packages for employers.
- Clarification regarding how qualifications align with levy funding.
- Investment in careers advice services.

### **Other Comments (13 references)**

431. Some other issues and suggestions were included in the responses as detailed below:

- There is the potential for confusion among employers with regards to the different technical education routes.
- IoTs could act as ambassadors for HTE and provide a useful platform for promoting it to employers.
- There need to be clear links between HTE and labour market information.

## Question 26. 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.

432. In the consultation DfE set out its plans to encourage flexible provision for people with other responsibilities and to make sure that the most disadvantaged can access HTE. This question asked respondents for further evidence and ideas in this area.

433. There were 135 text responses to this question. Many of the comments made related to the need for both accessibility and flexibility with regards to HTE, the need for a supportive learning environment and discussion around funding for HTE.

### Promote accessibility and/or flexibility (54 references)

434. Respondents expressed a range of views on the **accessibility of HTE and the flexibility of delivery**. Many felt that access to HTE should be maximised and that putting in place the right kind of support would ensure wide participation.

435. The needs of specific learner groups (black, Asian minority ethnic (BAME) groups, girls/women, care leavers, those experiencing mental ill health, migrants and learners with SEND) in relation to funding, promotion and accessibility were outlined. This was linked to social mobility.

*“There are additional benefits in terms of widening participation and engaging with groups and issues (e.g. mental health) which are often overlooked. The role of HTE in social mobility has been long undervalued and is rightly seen as a key objective.”* Provider (FE)

436. With reference to SEND learners, it was noted that Education, Health and Care plans (EHCPs) do not go beyond level 3 and was felt that Disabled Students Allowance provided only minimal levels of support for this group.

*“Minimal support via Disabled Students Allowance is available to learners with a formal diagnosis e.g. of dyslexia or autism spectrum disorder (ASD). However, DSA [Disability Support Allowance] generally only funds one hour of 1:1 support per week. As a result, a learner with a diagnosis of dyslexia or ASD who has been receiving a full 16 hours of support for their level 3 studies suddenly finds themselves having to manage with just 1-2 hours of mentor support at level 4+. They may have very high technical ability but struggle to cope with the workload and organisational skills required on a level 4+ course, simply because they are not receiving enough non-technical/non-academic support. There is a sharp cliff-edge in support and many learners who have been high achievers at level 3 simply fall off.”* Provider (HE)

437. Adult learners were regarded as having specific needs that required consideration. It was noted that they may be more likely to access specific Adult Education provision in preference to generic HE/FE providers, and that they may have had negative experiences of education and therefore find classroom learning more challenging.

*“We get a lot of students who come to do a level 4 or 5, for example specialist make up or chef-ing, but might not have an English or maths GCSE. We need to support them to get this, but you’re setting them up to fail if you’re putting mature students in a classroom with students studying this for the first time. They moved classes to evenings, and now it’s a totally different atmosphere.”* Professional/business organisation

438. The location of training provision was seen as important in relation to improving access and enabling students to study. Issues discussed were the availability of public transport, broadband speeds and internet access, travel costs and time, and the need to target areas of greatest disadvantage. One respondent felt that local training courses should be directly matched to the local labour market; another felt that the location of the IoTs in large cities may disadvantage their area.

*“IoTs are only available in a few large cities, are there plans to extend these, alongside improvements to FE and HE facilities to improve access to high quality learning environments for all learners? We would not wish for Lancashire to lose out on the opportunities which IoTs offer.”*  
Professional/business organisation

439. Other responses addressed specific approaches to promoting accessibility and flexibility:

- The provision of online/distance learning.
- Delivery on evenings and at weekends.
- ‘Step-on, step-off’ modular provision that fits with working and other commitments.
- Part-time provision and day release options.
- The use of mentors.

### **Funding for HTE (41 references)**

440. **Funding and financial support were frequently mentioned by respondents.** It was argued that the HTE proposals had the potential for a positive impact, but many felt that this was conditional on the right funding being in place. Perceived inequalities in funding and the lack of specific funding for HTE were discussed, with some respondents noting the recommendations of the Augar Report.

*“Whilst legislation supports young people to study to certain levels and supports apprenticeships, there is little official support for study at HTE*

*level, which is a disincentive for learners and employers.”*

Professional/business organisation

441. It was felt that funding would be a major consideration for students, and in particular for mature learners or those from more disadvantaged backgrounds. From the provider perspective, there was seen to be some financial implications in terms of up-front funding for equipment and IT.

*“[there can be] substantial upfront costs for providers including on staff training, changes to IT systems and development of student support.”*

Provider (HE)

442. Other comments on funding included:

- The government should consider using the apprenticeship levy fund to support HTE learners.
- Consideration should be given to grants and scholarships.
- There should be funding for adults to visit workplaces and/or for field activities.
- Funds should be used to open buildings for training outside core office hours.
- Any funding offer needs to be coherent, clear and simple.

### **Create a supportive learning environment (20 references)**

443. The importance of creating a **supportive learning environment** was raised. The provision of wider support, it was argued, was key to student retention, satisfaction and learning outcomes. In addition to the use of mentors, coaching or confidence building and a sense of community among students was deemed important. This could, for example, be achieved through extra-curricular activities or a student union.

*“Furthermore, studies have shown that key to retaining a student in education is a sense of belonging and community, which is often fostered through either close connection on a course or engagement with a students’ union and the opportunities it offers.”* Professional/business organisation

444. The provision of pastoral and academic support was linked to success rates particularly among adult learners. One college outlined how its support of student learning through an Academic Support Tutor had made a positive impact.

*“At [name of college] we employ an academic support tutor who works with learners studying at level 4 and above to provide them with the academic skills they need to be able to operate at the higher level. The tutor works alongside the programme lecturers to off bespoke workshops*

*and tutorials to students on things such as; referencing, essay writing, planning a project, research techniques.” Provider (FE).*

### **Improved information on HTE (6 references)**

445. Some responses referred to **information provision for potential students**. They stated that information must be clear and unambiguous and that possible career pathways should be easy to understand. It was also suggested that information on the likely financial returns for different career pathways should be communicated to learners when they are considering HTE.

446. One respondent stated that student drop-out could be reduced by ensuring that potential learners had, in advance, clear information about the scope of the course, what it would cover and what would be expected of them.

*“A lot of students drop out because they realise the course isn’t for them. It’s about making sure they know what to expect and managing their expectations of course content, the environment and the academic expectation. That would really make a difference.”* Professional/business organisation

### **Other (25 references)**

447. Other issues raised by respondents to this question have been included below:

- Respondents reiterated that working closely with employers and their representative organisations was important.
- Several respondents stressed that progression for learners from levels 2 and 3 and then beyond level 4-5 should be seamless and automatic. It was suggested that this could be facilitated by offering level 4-5 qualifications on a credit or ‘building blocks’ basis.
- One respondent felt that further evidence was needed regarding what works in this area.
- Another respondent felt that it would be useful to learn lessons from the success of both A Levels and degrees.
- A small group of respondents discussed future challenges, including the need to future skills needs, respond to rapid technological advances and give consideration to future funding sources (post the European Social Fund (ESF)).

### **Feedback from the consultation events**

448. Consultation event attendees agreed with the importance of targeted promotion of HTE to improve perceptions, and teachers and school staff having a clear understanding of HTE to provide effective careers IAG. Event attendees highlighted that the apprenticeship campaign had been a success and that there was potential to learn from this.

449. There was agreement that raising awareness of HTE was needed and that older adult learners, in particular, will require a flexible approach e.g. modular learning, and targeted and tailored IAG. The event consultees highlighted the need for a clear application system – suggesting the use of UCAS for level 4 and 5 technical education.

450. Event attendees also stressed a need for financial support directed at both students and providers. This was seen as being crucial in promoting the uptake of HTE.

## E: Wider impact

### Summary

This section of the consultation asked respondents about the wider impacts of the proposed reforms in relation to the Equality Act 2010 and for any other comments.

### Wider impacts

Respondents indicated a **range of potential impacts the proposals outlined in the consultation might have on individuals with a protected characteristic under the Equality Act 2010**. These covered:

- **Barriers to access**, with concerns about specific needs that might need to be met.
- **Auditing and/or impact assessment**, with the desire for more detailed or more regular reviews.
- **HTE funding concerns**, recognising the cost of adapting programmes to the needs of those with protected characteristics.

### Other comments

Other comments made by respondents included:

- Concerns regarding how the new HTQs will fit with the existing technical education landscape and the ongoing T Level implementation.
- Role of employers – with some feeling it would be insufficient, while others felt employers might be too dominant.
- Many respondents raised specific clarifications and request, including the importance of ongoing formative evaluation.
- The need for improved relationships between providers of technical education.

### **Question 27. Do you have any comments about the potential impact the proposals outlined in this consultation may have in individuals with a protected characteristic under the Equality Act 2010**

451. A total of 117 text responses were provided for this question. The issues addressed in responses were barriers to access, auditing and/or a need for further impact assessment and HTE funding concerns. Six references outlined that respondents did not have any concerns regarding individuals with a protected characteristic. Most of the responses to this question were from professional/business organisations or providers.

## Barriers to access (7 references)

452. There was some discussion in relation to **barriers for those with protected characteristics**<sup>8</sup> and for other groups. Respondents raised the following issues:

- Widening participation was seen to depend upon HTQs having sufficient credibility among employers. A large proportion of the technical education student group were seen to have protected characteristics.
- It was suggested that potential (and older) adult learners might be disadvantaged as they will not have completed T Levels.
- It was stated that students with protected characteristics would need specific support in relation to work placements, and that industries would need support in providing a non-discriminatory work environment.
- Learners with SEND were felt to potentially benefit from virtual learning environments. It was also argued, however, that support should be provided for learners with SEND to access practical learning environments.
- It was noted that people with protected characteristics may be more likely to have come into learning via non-traditional routes. It was considered that reform at level 3 would be required to ensure that this group are not further disadvantaged.

*“First, if reform to HTE at levels 4 and 5 is to succeed for individuals with protected characteristics, reform at level 3 must be successful. If it is not, it will be harder for individuals to be successful at levels 4 and 5. Second, extra care should be taken when reforming technical routes to high-level skills and employment. If reform fails, it will disadvantage already disadvantaged groups.”* Provider (HE)

## Auditing and further impact assessment (6 references)

453. A small number of respondents felt that the **impact assessment needed to be more detailed**, or that there would be a need for more regular auditing or review. One respondent suggested that the wider impact assessment should take account of the impact of student choices and the risk of HTQs becoming obsolete.

*“The full impact assessment will need to consider a number of potential risks, including: [1] Some students may inappropriately choose a higher technical qualification when other tertiary options open to them given their skills/aptitudes – such as a degree – would have higher lifetime benefits; [2] Some students may make bad choices and end up doing a highly*

---

<sup>8</sup> **Under the Equality Act, there are nine protected characteristics:** age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sex.

*specialised higher technical qualification in an occupation where they do not wish to spend their career or which has limited suitable job opportunities. [3] Economic and technological change may make the useful lifespan of higher technical qualifications in some occupations short or substantially reduce the demand for particular occupational skills in a local area. The risk is that qualifications rapidly become obsolete and that the specialist technical knowledge of little use to people in moving to employers in other sectors of the economy.” Provider (HE)*

### **HTE funding concerns (5 references)**

454. Some of the responses stated that **funding was key to engaging those with protected characteristics** or from other disadvantaged groups. It was felt that there was a risk that these groups could be ‘left behind’ and the need for parity of funding with academic routes to avoid a negative impact on those with protected characteristics was noted.

*“HTQs have particularly high take-up by BAME and disadvantaged learners. Parity of funding (including tuition fee and maintenance support) with academic HE is essential to ensure the proposals do not have a disproportionately negative impact on these groups.” Provider (HE)*

### **Other (15 references)**

455. Other issues raised in responses included:

- Supporting inclusivity by ensuring flexible delivery of HTE.
- The impact of a perceived lack of SEND provision in schools and FE.
- The need for the same regulation regarding inequalities of student outcomes for HTE and HE as a whole.
- The importance of challenging gender stereotypes associated with some technical careers early on.
- Considering the accessibility of written information.

### **Question 28. Do you have any other comments?**

456. A total of 126 respondents provided other comments. A large proportion of responses outlined specific concerns, queries or recommendations they had in relation to the HTE proposals. Some expressed their support and others raised issues relating to the HTE systems and approach.

## Concerns about the introduction of HTQs, queries, requests and recommendations (35 references)

457. Respondents raised a range of concerns about the HTE proposals, made some recommendations regarding the approach, and a few made specific requests. The areas covered have been included under each of these headings.

458. **Concerns** were expressed regarding how the new HTQs will fit with the existing technical education landscape, how effective employer engagement will be achieved, and the approach that has been taken to date. The main areas addressed were:

- The view that the proposed reforms adopt a bureaucratic approach at the expense of innovation.
- Concerns that university pathways are perceived as ‘non-technical’. For example, it was noted that engineering is taught in university and it incorporates placements and industrial partnerships.
- The perception that there has not been a joined-up approach between this consultation and the recommendations that have come out of the Augar Report.
- A view that both employers and students will need to be convinced that HTQs are worthwhile, as they will have to compete with degrees.
- One provider organisation stated that it had some concerns about the dominant role of employers, as it was felt that this would result in narrow standards. This respondent argued that education should be about more than just securing employment.
- A need for local flexibility and clear pathways into HTQs and then onto higher level studies.
- One respondent outlined a concern that HTE reforms should not disrupt the success of existing level 4 and 5 provision.
- There was concern that the HTE proposals have not been informed by sufficient evidence or a theory of change.

459. Respondents outlined **recommendations, queries or requests** for the proposals as follows:

- Clarification of the equivalence of HTQs and other HE qualifications should be provided.
- Funding should be put in place in order to promote participation and to overcome barriers.
- There should be some ‘future proofing’ in order to address skills needs in the future and to meet the needs of emerging sectors.

*“Where does future skills needs or emerging sectors get addressed. The Occupational Maps don't have scope for this. Should some flexibility to be put in the system to enable these emerging areas to grow. Our experience in working with an emerging sector is that the level of understanding in the employer-market is very limited and it is the project itself that can define*

*need. We need to be considering how we train for tomorrow otherwise the productivity challenge will be a virtuous circle.” Education*

- Account should be taken of the Augar Report proposal that level 6 qualifications should have ‘jump off’ points at level 4 and 5.
- The success of HTE should be evaluated, and consideration given to the evaluation before the launch stage.

### **HTE systems, approach and delivery (15 references)**

460. Other comments were made about the approach and delivery of HTE and impact this will have more widely. It was noted that recently **there has been significant change in relation to technical education** (e.g. the Augar Report and T Levels). It was suggested that there should be caution with regards to reforms to HTE being implemented at the same time, not least given the impact on provider resources. It was thus suggested that a manageable approach should be taken to change with pauses to review and clarify. Timescales should be reviewed and if necessary revised.

461. Responses emphasised that the understanding of HTE needs to be consistent across stakeholders and shaped by an effective engagement programme for learners, employers and the public.

462. There was also support for lifelong learning, which was seen as being key to economic growth in the UK. As such, it was argued HTE needs to work effectively for both adults already in employment and for young people.

### **Support for HTE proposals (12 references)**

463. Some respondents outlined their support for the proposals in relation to following areas:

- The proposals provide an opportunity for learners to develop technical competencies.
- There was general support for the intention to increase take up of level 4 and 5 qualifications.
- This was seen as an opportunity to deliver the skills that employers need and want both currently and in the future and to outline the positive benefits of HTE for key sectors.

*“We particularly welcome these changes within STEM, an area with an ongoing skills shortage and an area where employers particularly value technical and vocational skills. These qualifications have the potential to increase the number of students taking on level 4 and 5 courses in engineering, where the biggest skills gaps in engineering are ... For these aims to be a success, it will be important to ensure industry buy in across all sectors and sizes of businesses.” Professional/business organisation*

## Provider relationships and Foundation Degrees (4 references)

464. A few of the respondents discussed the need to have improved relationships with and between providers of technical education, including having clarity regarding how HEPs are working with local colleges. There was a suggestion that consultation should be undertaken with those colleges offering Foundation Degrees to ensure that good practice already in place is retained.

## Other (39 references)

465. Other comments included views on how HTE is delivered, involvement of key stakeholders, reference to wider issues and concerns and responses to question 7 (that did not have a text box).

466. In terms of the more general comments, respondents variously stated that:

- Exam based approaches should not dominate HTE.
- Providers of HTE should be subject to robust quality checks.
- Schools have an important role in supporting technical education, both to raise aspirations and to provide a stronger foundation for skills development and transferability.
- Funding for technical education should be devolved to the regional level.
- Skills Advisory Panels should be fully engaged in the process.
- Technical skills are vital in achieving economic growth.
- To overcome barriers it will be important to have modular delivery and the promotion of accessibility.
- A focus on management skills could bring significant benefits for UK business.

*“As a Professional Body, and in line with our Royal Charter, we are keen to support any policy around developing management and leadership skills in the UK. Our qualifications accounted for 34% of all Business, Administration & Law certifications at level 5 in AY 2017/18 (based on Ofqual’s analytical data) and feel inclusion in any developments is important to ensure validity and high quality.”* Professional/business organisation

467. In relation to Question 7, which asked about the extent of agreement with the proposed aims of HTQs, respondents made the following comments:

- The inclusion of ‘behaviours’ as an essential part of HTE was positive.
- Limiting HTQs to specific occupations could result in limited portability and flexibility, which would potentially disadvantage students.

- The range of knowledge and skills for a given occupation can be wide-ranging and that, as such, it may not be practical to include everything that a given occupation requires in the HTQ.
- HTQs should not necessarily be promoted as alternatives to degrees/apprenticeships.

## 4. Conclusions

468. This section provides the key conclusions emerging from each of the consultation sections.

469. Levels of agreement with the proposals were high across all the questions. There were consistent themes that recurred across responses to many of the qualitative questions. These made specific reference to resources, and financial support. There was an assumption made by respondents that infrastructure and funding would be put in place to make the proposed reforms to HTE work. Other recurring themes related to the needs of older adult learners, awareness raising requirements, a need for clarity regarding HTQs, and reduced complexity and/or bureaucracy in HTE.

### HTQs

470. There was strong agreement, among nearly all respondents, with the proposed aims of HTQs as laid out in the consultation document and widespread support for the ambition that they provide a high-quality technical route for young people and adults that provide much-needed skills for current and future labour markets.

471. Key to the success of HTQs was believed to be strong, well-functioning and long-term partnerships between industry and academia and sustained government support in raising their profile and prestige amongst students and employers.

472. Most respondents were seeking a well-defined, fair, transparent and efficient approval process. They wanted this to be in-line with existing systems and able to respond to the ever-changing needs of the market.

473. They also wanted relevant stakeholders to be involved and consulted in the approval process from the start to ensure assessment frameworks are fit-for-purpose and consistent workable practices are embedded.

474. Some respondents felt that panels and groups should not be limited to a small number of influential stakeholders. Instead they should have diverse, representative expertise, capturing a wide-range of industrial and pedagogical perspectives. This would enable them to recognise effective learning models, as well as industry best practice.

475. Where supported, mapping qualifications against occupational standards was thought by a few respondents to be valuable in ensuring consistent delivery and providing clear entry routes into skilled employment. However, a few respondents thought that the design of standards needed to be carefully considered to avoid risking gaps in provision, narrowing skill sets and to ensure that the breadth of technical and creative sector demands are met. Clear, up-to-date and flexible standards and definitions were considered imperative in ensuring that provision not only meets current local and national skill requirements, but that the skills required for the future labour market are reflected.

## Delivery of HTE

476. In order to ensure engagement with the HTE reforms, many respondents needed to be confident that regulatory processes would be streamlined and designed to avoid duplication and add value to what is considered an already highly regulated system. Roles and responsibilities of the various bodies involved were felt to need clarification, and some respondents sought assurances that the system would not prevent industry and academic partnerships from responding adequately to labour market dynamics.

477. There was a consensus that the outlined quality criteria were suitable markers of high-quality technical provision and, in many cases, they were considered fundamental. However, questions were raised about the practicalities of meeting the criteria and how they would be assessed in practice. Some respondents questioned the value of focusing on inputs, rather than learning outcomes, and emphasised the need to measure the benefits of provision in providing clear and robust employment pathways. Additionally, it was argued that further research and evidence needed to be undertaken to understand what constitutes 'quality provision' in this space and to clarify and define quality benchmarks.

478. It was strongly argued that investment in the infrastructure needed to create suitable learning environments and measures to recruit and retain staff were essential to meeting the quality criteria and removing barriers for engagement. Further, it was anticipated that government support would be required to help facilitate links between industry and academia in areas where networks have not yet been built.

479. Whilst it was felt that some quality provision already exists in this space, it was also felt that a substantial amount of both capital and grant investment would be required to bring HTE to an appropriate, future-proofed standard, especially in certain geographical areas and sectors. Capital funding would be required for the upfront costs to ensure the acquisition of up-to-date facilities and equipment, while recurring grant funding was also required for long-term sustainability and to meet the ongoing costs associated with design, development and delivery of high-quality HTE.

## Student and employer demand

480. There were high levels of agreement with young people and adults undertaking HTE in the future and with the proposed measures to improve the profile of HTE and IAG.

481. Significant skills gaps across a range of sectors and industries were reported and it was felt that meeting this skills demand would require high-quality technical training for young people and for adults throughout their working lives.

482. HTE was thought to have a key role to play in promoting social mobility, particularly for those in low-skilled work and in jobs at risk of obsolescence (due to technological advances). To fulfil this role would require sometimes entrenched perceptions that technical education is a second choice to academic university routes to be challenged.

483. Many respondents highlighted the importance of investing in raising awareness of HTE. This could take the form of active promotion, campaigns and close collaborative working with professional bodies and employers. In addition, it was felt that investment and training were also essential in ensuring that careers IAG is of a high standard and can provide information on clear and coherent career pathways for a wide range of HTE learners.

484. It was argued by some respondents that careers IAG for technical education should start at a younger age (and potentially in primary school), be accessible to learners already in employment, and specifically target teachers and parents as important influencers. Respondents wanted provision of IAG to utilise multiple communication channels, including social media, employer events and online learning options.

485. Employers and professional bodies were thought to have a key role to play in this through work placements, case study development and the provision of talks or presentations. Building links and creating partnerships with business organisations/professional bodies was considered important in supporting their involvement in the provision of IAG, improving the response to skills shortages and ensuring full employer involvement in course development.

486. A few respondents also felt that specific consideration needed to be given to the information and access needs of specific groups, including those with SEND, adult learners and other minority groups.

## **Wider impact**

487. There was significant discussion of the barriers faced by different groups in relation to accessing HTE. Many respondents wanted a HTE system that successfully overcomes major barriers by ensuring that HTQs have credibility and by providing sufficient funding, targeted support, work environment adjustments, and a range learning delivery options e.g. virtual learning.

488. Although levels of positive support for the proposals were widely expressed, there were some concerns that a few respondents felt should be given further consideration. Key issues for further consideration were: the fit of HTQs within the complex technical education and HE landscape; further consideration and incorporation of the recommendations in the Augar Report; an avoidance of greater complexity and bureaucracy; and ensuring that HTQs work effectively for adult learners looking to re-train and switch careers.

## Appendix One: Word counts

Word counts in the qualitative text have been provided in the table below:

<b>Question</b>	<b>Word count</b>
8	28205
9	6172
10	13258
11	21995
12	6758
13	10701
14	7391
16	5,356
17	4429
18	3448
19	3282
20	6895
21	6909
22	7902
23	14188
24	9631
25a	8253
25b	3367
25c	3475
26	8579
27	1836
28	7885
	189915

## Appendix Two: Review of each code by references

**Question 8. 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? (n=113 responses)**

Theme name	References	Description
The structure of the approval process	87	Perceptions on how the approval process should ideally operate and suggested methods to ensure efficiency, fairness and robustness
Mapping qualifications to occupational standards	45	Advantages and disadvantages of mapping qualifications to standards
Resources and timescales associated with the approval	39	Concerns regarding resource
Impact on existing provision	35	Perceptions and clarification requests on effect of existing provision
Qualification content and structure	25	Thoughts on practical and academic skills balance
Voluntary approach to approval, market complexity and the potential of introducing a two-tier system	24	Discussions on the risk of market confusion and complicating the market further
Employer commitment and involvement	24	Expectations for employer and other stakeholder input

**Question 8. Open. What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply? (n=83)**

Theme name	References	Description
Organisation insolvency / market failure / priming the market	39	Views on the proposed protocols for copyright transfer
Protecting intellectual property	28	Discussions on the importance of intellectual property protection and risks of disincentivising submissions
Protecting student interests	13	General points regarding prioritising student needs

**Question 10 Open. Please provide any specific views on points a-e**

Theme name	References	Description
Enhanced support for potential students through IAG	54	Value of IAG
Competitive funding package	43	Perceptions on funding package proposals
Clear mark of labour market relevance	40	Merits of kitemarking
General comments on importance of incentives	28	General views on the proposed incentives
A swift and straightforward process for submission, appraisal and decision making	27	Thoughts and concerns regarding the approval process
Other incentives proposed	25	Other suggestions / comments

**Question 12. Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements? (n=93)**

Theme name	References	Description
Harmonising / streamlining regulatory arrangements	42	Perceptions on the risks of a duplicative, burdensome system / calls to streamline regulatory processes
General comments on retaining the regulatory arrangement	30	General views on proposals
Ofqual and/or QfS's involvement	19	Queries raised / clarification required over the two bodies' involvement in the process
More clarification and clarity required	18	Points raised regarding clarification over the various regulatory procedures and roles and responsibilities of the different bodies
Ensuring the technical need is met	15	Comments on the degree to which the proposed process will adequately serve the technical skills demand

**Question 13 Open. Give reasons why or why not. (n=91)**

<b>Theme name</b>	<b>References</b>	<b>Description</b>
General comments	71	General comments supporting criteria
Quality of course delivery and teaching staff	43	Quality of course delivery and teaching staff
Facilitating links between academia and industry	44	Facilitating links between academia and industry
Access to facilities and equipment	21	Access to facilities and equipment
Assessment criteria	31	Assessment criteria

**Question 14 Open. If you disagree, please give reasons (n=83)**

<b>Theme name</b>	<b>References</b>	<b>Description</b>
Adding additional layers, creating an overly bureaucratic system and resource concerns	53	Concerns raised over the risk of creating a complicated system
Expertise of OfS in determining conditions and clarification on roles and responsibilities	25	OfS and other statutory bodies roles
Alternative approaches and suggestions	17	Other suggestions to determine quality

**Question 16. How might this work to ensure provision best meets local skills needs? (n=78)**

Theme name	References	Description
Skills strategies / aligning with local need	43	Importance of skills strategies to determine local need
Having open dialogue / collaborative working	14	Comments made around better networks and consultation between stakeholders
Access to facilities and equipment	15	Facilitating access to facilities and equipment
Links with registration conditions	15	Benefits of linking additional investment with OfS additional technical registration
High quality qualifications	7	Comments on how providers demonstrate quality
Other comments	24	Other comments

**Question 17. What specifically would additional funding support? (n=80)**

Theme name	References	Description
Access to equipment / facilities / resources	44	Help with gaining access to appropriate learning environments
Investment in teachers or lecturers	42	Recruitment, retention and upskilling of staff members
Facilitating links with industry / employers	23	Building academic/industry networks
Programme developments / new provision / build capacity	23	Help developing programme and course content / creating innovative provision
Workplace learning	15	Help facilitating appropriate workplace learning
Research / evidence / promotion	10	Building an evidence base and helping raise the profile of HTQs

**Question 18. Would additional costs be a barrier to delivering high quality HTQs, why? (n=73)**

Theme name	References	Description
General comments	42	General comments on degree to which additional costs would be a barrier and why
Technical equipment, facilities and associated costs	22	Expense of delivery
Recruiting and retaining high quality, experienced teaching staff	17	Recruitment, retention and upskilling of staff members
Administrative costs	13	Costs associated with registration / ongoing regulatory costs
Smaller markets / cohort	8	Expense of operating in niche markets
Course development / set-up costs	6	Programme and content development

**Question 19. Which would be a greater priority: capital or recurrent grant funding? Or both equally? Why? (n=75)**

Theme name	References	Description
General comments	41	General comments
Importance of capital funding	48	Importance of capital funding
Importance of grant funding	51	Importance of grant funding

**Question 20 Open. What might examples of non-financial support be? (n=73)**

Theme name	References	Description
Building links between provider and employers	91	Facilitating academic/industry networks
Promotion / profile raising / sharing best practice	31	Raising the profile and prestige of HTQs amongst employers and students
Building capacity / new provision / addressing skills needs	27	Stimulating the market / innovative programme development
Information and guidance	21	Improved IAG to providers, employers and students
Supporting work placements	13	Facilitating work-placed learning
Quality assurance	6	Support with regulatory quality processes
Other comments	20	Other comments

**Question 21. 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. (n=75)**

Theme name	References	Description
Building links between provider and employers	28	Facilitating academic/industry networks
Recruiting and retaining high quality, experienced teaching staff	17	Recruitment, retention and upskilling of staff members
Skill shortages and regional need	16	Consideration over where demand is great
Access to equipment / facilities / resources	13	Help with gaining access to appropriate learning environments
Promotion / profile raising / sharing best practice	13	Raising the profile and prestige of HTQs amongst employers and students

**Question 22. Open. Why? (n=90)**

<b>Theme name</b>	<b>References</b>	<b>Description</b>
Creation of a two-tiered system	42	Risks of dual system with perceived inferior and superior products
Driving quality and building capacity	20	Will encourage an uplift in quality provision
Encouraging take-up amongst students	18	Raise positive perceptions amongst potential students and increase take-up
More consultation / clarification required	39	Further consultation with stakeholders and students required specifically on funding

**Question 23: 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? Please provide examples from your experience (n=142 responses):**

Theme name	References	Description
The skills gap – upskilling in certain areas required	63	Discussion of gaps in skills and challenges in addressing these.
Other	34	Other examples
Raising awareness and better IAG	33	Need for and approaches to raising awareness of HTE
Older adult learners	18	Demand, needs and requirements of older adult learners
Barriers to undertaking HTE	15	Discussion of the barriers to taking up HTQs e.g. flexibility and financial issues
The impact of cultural and wider social contexts	11	Perceptions of technical education, the impact of this and social contexts e.g. socio-economic disadvantage
Encourage the development of specific courses or HTE routes	10	HTE career pathways and discussion of sector specific courses
Provision of practical learning	8	Practical learning opportunities are important
Support and resources for technical subjects in schools	8	Discussion of funding and sources of support for technical education and young people/learners
Encourage an embedded CPD culture	7	The need for CPD to be in place to support upskilling and re-training
Encouragement for career development	7	Need to increase uptake of HTE and transferability of skills

**Question 24: To what extent do you agree or disagree with these measures to improve the profile of HTE? Please provide any additional ideas (n= 140 responses)**

Theme name	References	Description
Provision of quality IAG	22	Need for improved careers IAG, investment, awareness raising and training
Other comments	22	Other comments
Promotion by and links with local employers, industries or professional bodies	21	The need to promote to these groups to promote credibility and demand and to secure commitment to HTQs
Improve the promotion of technical education in schools	15	Need for technical education to be promoted in schools to younger pupils.
Funding and value for money	10	Discussion of finances for HTQs and technical education
Comments about complexity, bureaucracy	5	Caution about the creation of further complexity/bureaucracy as a result of proposals
Explicit government support for technical and creative subjects	4	Need of government to promote HTQs and to support providers

**Question 25 (a). To what extent do you agree or disagree with these measures to improve IAG for young people and their teachers, adults and employers? In what other ways could we help fill the HTE information gap for: young people and their teachers. (n=139 responses)**

Theme name	References	Description
The provision of good quality careers IAG and career pathways	39	More focus, training and consideration of careers IAG and technical education career routes.
Target parents, teachers and young people	36	Comments about the role of parent and teachers in providing support and information for young people.
Promotion and marketing to young people	26	Comments about promotion and marketing approaches and information needs.
Clear links at KS2-KS4 to HTQs	22	Reference to the need to focus on younger pupils to support appropriate technical education skill development.
Improved employer links	19	Improvements in the links between schools and employers needed.
Cultural context and perceptions of technical education	9	Impact of perceptions about technical education careers and cultural context.
Change the mindset of influencers	5	Need to target those who have a strong influence on young people.
Other	13	Other comments

**Question 25 (b). To what extent do you agree or disagree with these measures to improve IAG for young people and their teachers, adults and employers? In what other ways could we help fill the HTE information gap for: Adults. (n=130 responses)**

Theme name	References	Description
Targeted promotion and marketing	32	Greater information and marketing to adults is required.
More promotion and links with IAG, employment organisations or large employers	26	Links between IAG and employers need to be strengthened.
Need for greater flexibility	7	Reference to adult learners needing a flexible approach
Support for industry or employers	4	Support for employers to provide re-training opportunities.
Other	10	Other comments

**Question 25 (c). To what extent do you agree or disagree with these measures to improve IAG for young people and their teachers, adults and employers? In what other ways could we help fill the HTE information gap for: Employers. (n=128 responses)**

Theme name	References	Description
Engage trade or professional bodies	19	Value of linking with employer bodies discussed.
Targeted promotion and marketing	16	Information and marketing needs to be targeted at employers.
Employer involvement	15	Discussion of employer involvement in HTQs
Provide links with learning providers	15	Links need to be in place between employers and providers.
Employer events	7	Value of employer events discussed for information and promotion.
Financial incentives	6	Additional funding needed for employers.
Other	13	Other comments

**Question 26. 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 (n=135 responses)**

Theme name	References	Description
Promote accessibility and/or flexibility	54	Flexibility and accessibility need to be considered for delivery of HTQs.
Funding for HTE	41	Importance of adequate funding in HTE
Create a supportive learning environment	20	Wider support needed for student retention and satisfaction.
Improved information of HTE	6	Information should be clear and well communicated.
Other	25	Other comments

**Question 27. Do you have any comments about the potential impact the proposals outlined in this consultation may have in individuals with a protected characteristic under the Equality Act 2010(n=117 responses)**

Theme name	References	Description
Barriers to access	7	Discussion of barriers face by those with protected characteristics.
Auditing and further impact assessment	6	Need for further assessment and/or auditing.
No concerns	6	No concerns about this.
HTE funding concerns and impact	5	To address the needs of this group funding needs to be put in place.
Other	15	Other comments

**Question 28. Do you have any other comments? (n=126 responses)**

Theme name	References	Description
Concerns about the introduction of HTQs, queries, requests and recommendations	35	Re-iteration of additional comments outlining concerns, recommendations, queries and requests
HTE systems, approach and delivery	15	Comments about the proposed approach and systems for HTQ delivery.
Support for HTE proposals	12	Respondents expressing their support for the HTE proposals.
Consider institutions already delivering Foundation Degrees	4	Existing provision and providers should not be overlooked.
Other	39	Further comments including on question 7.

## Appendix Three: HTQ email responses

489. Nine email responses to the consultation that did not respond to the specific consultation questions were received from representative bodies. These have been analysed and reported below in line with the four headings of the online consultation.

### HTQs

490. Across all nine responses, there was widespread support for the government's ambition to ensure that HTQs provide a high-quality technical pathway for young people and for adults looking to upskill or retrain, and that these qualifications provide the skills that employers need. There was also agreement that qualifications should be developed and approved against employer-led national occupational standards and that employers should play a key role in the approval process. The role of the Institute in developing, approving and regulating HTQs was also supported. The roles of the Institute and Ofqual/OfS were seen as complementary and not a duplication of regulation.

491. The email responses suggested that the following would help maximise the success of the proposals:

- Consulting with professional bodies on HTQs at the approval stage to help ensure that employers value the quality mark where professional bodies already perform a quality assurance role.
- Focused and relevant communication to employers and ABs to demonstrate the existence, purpose and benefit of the quality mark process, and to promote the occupational standards (recognising that their purpose has now been extended beyond apprenticeships).
- Increased quality to boost increased employer interest and clearer pathways to encourage young people's interest.
- Adopting a standardised approach across all HTE, including apprenticeships, to ensure consistency of message and a coherence of the HTE system.

*"It is critical that the coherence of the system is always considered in order to create a more joined-up and holistic education system which enables firms to engage easily."* Representative body

### Delivery of HTE

492. Feedback received under this heading centred around three main aspects of HTE delivery:

- **Teaching staff:** recruitment, retention and development of teachers for HTE was noted as a key challenge for many providers, particularly FE colleges. The email responses

noted the differences in FE provider and HE provider salaries and the current shortfall in the number of FE teachers that are qualified to teach at level 4 or above. Some of the email responses felt that solutions to this problem should be a priority for government investment, e.g. establishing a graduate entry programme for those wishing to teach at this level and having specialist regional centres of excellence for technical teaching. Others raised the importance of staff knowledge of practical work environments and relevance of subject matter to the workplace.

- **Flexibility:** there was a consensus across the email responses that HTQs need to be flexible, e.g. shorter and modular, in order to appeal to mature learners and meet the needs of employers.

*“To maximise employer return on investment in higher technical education, the system needs to enable employees to complete courses of study and achieve qualifications when they experience changes in personal circumstances, such as family commitments and other demands. Qualifications should, therefore, be available in modular form.”*

Representative body

- **Funding:** it was suggested that financial support should be available for providers to support them with the proposed new processes and to support successful delivery of HTE. It was felt that even though delivery of HTE can be more expensive than academic programmes, it attracts less funding than degree-level courses. Responses also pointed to the need for equitable geographic availability across regions of England.

## Student and employer demand

493. Across all nine email responses, there was a clear and strong message that there is a need for HTE to meet the skills needs of the economy. Evidence was provided around current technical skills shortages and the impacts on the economy of having a so-called ‘missing middle’.

494. In order to maximise student and employer engagement with HTQs the following suggestions were made:

- **IAG:** school staff need to understand, promote and uphold the prestige of HTE, including delivering independent, up-to-date careers IAG. The perceived lack of understanding and awareness amongst school staff would need to be addressed to ensure that HTE is promoted as an alternative to academic routes and consideration should be given to existing sector IAG initiatives e.g. CITB’s Future Made.

*“[There needs to be] Independent, up-to-date careers information, advice and guidance on technical and vocational learning and career options for young people and adults as a quality alternative to traditional academic routes.”* Representative body

- **Promotion:** there is a need for an extensive communication and engagement campaign to raise awareness of HTE amongst employers, young people, school staff and parents. This should focus on:
  - HTQs being a pathway to both degree-level qualifications and high-skilled employment.
  - Differences between HTQs and apprenticeships.
  - Addressing employer benefits e.g. up-skilling and increasing productivity.
  - Funding available to students.

*“The changes to higher technical qualification should be accompanied by an extensive communication and engagement campaign to raise employer awareness.”* Representative body

## Wider impacts

495. A small number of the responses suggested that the proposals could have a positive impact on the groups protected by the Equality Act. Feedback included the potential of the proposals to improve social mobility and increase widening participation through greater access to high-quality technical education. A small number of the responses indicated that a further equality impact assessment should be undertaken to accurately determine the impacts of the proposals.

*“Any investment in this area must demonstrate benefit to all communities and deliver opportunities for under-represented groups; it will be important to independently assess this impact, to demonstrate societal benefit and make recommendations for future investment.”* Representative body

## Appendix Four: HTE consultation events analysis

496. This appendix provides analysis of six consultations events held by the DfE in September 2019. The consultation events were held in locations across England.

497. Attendees at the consultation events were asked eight questions covering three of the four areas of the online consultation. Feedback from attendees is summarised by question in the sub-sections below.

### HTQs

#### Question 1: 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?

498. There was a general consensus amongst attendees that the proposal could work well if:

- Engagement was voluntary and opt-in.
- The proposals did not duplicate work that is already in place to ensure that qualifications meet employer needs.
- The process was reflective of local employer needs.
- A range of employers were involved and the process was not dominated by large employers.

499. Within other feedback provided, attendees largely raised questions and/or concerns around several aspects of the proposal. Feedback fell into three broad themes a) the use of occupational standards; b) the role of the Institute; and c) the proposed kitemark.

500. The following concerns were raised in relation to the **use of occupational standards**:

- Qualifications could be too narrow if focussed on occupational standards alone and may not provide wider skills that employers value.
- Occupational standards were not felt to adequately reflect the needs of local employers.
- There could be negative impacts for qualifications that are not currently matched to an occupation/occupational standard.

501. The following questions were raised in relation to the **role of the Institute**:

- It was suggested that the Institute might not have the capacity to deal with the volume of qualifications, resulting in the process of approval being slow and time consuming.
- It was thought that the Institute might not have the expertise undertake its proposed role. It was noted that its current role is to manage the standards and not to regulate. Concerns were also raised in relation to the Institute's track record in undertaking a similar role in relation to apprenticeships.

- Concerns were also raised around the role of Ofqual the potential duplication of regulation.

502. The following feedback was received in relation to the proposed **kitemark**:

- It was felt that the introduction of the kitemark itself would not improve perceptions of level 4 and 5 qualifications. Industry recognition was felt to be more important.
- Concerns were raised over the impact of a kitemark in creating a two-tier qualification system (i.e. those with and without the kitemark).
- It was felt to be important for the kitemark process to have adequate associated funding to help ABs undertake the process.
- It was argued that a phased roll-out (of a suitable length) was necessary to give provider organisations time to adapt to the new processes.
- Concerns were raised over the effectiveness of the kitemark if a large number of ABs chose not to engage. It was noted that engagement would be determined by the incentives made available.

## Question 2: Would you support incorporating the following flexibilities/requirements in the Institute approval process...?

503. Attendees were asked to consider the following flexibilities/requirements:

- Flexibility to incorporate additional content.
- Broader qualifications.
- Smaller qualifications.
- Flexible learning.
- Requirements for additional proficiency alongside HTQs.

504. The majority of consultation attendees supported incorporating the above flexibilities/requirements into the Institutes approval process. Feedback provided included:

- **Additional content:** attendees felt that flexibility to incorporate additional content (e.g. employability skills) that meets local employer need would be important. In the longer term, flexibility to ensure that qualifications are kept up-to-date (e.g. with technological developments) would be critical to ensure the qualifications remain fit-for-purpose.
- **Smaller/modular qualifications:** there was almost unanimous support for smaller qualifications and modular learning. This was felt to be important for CPD and in helping those in employment to up-skill. It was also felt that it would make training more financially viable for employers, especially SMEs.

*“SMEs can’t afford end-to-end qualifications but modules would be beneficial.”* Professional/business organisation

- **Flexible learning:** linked to the above, it was felt to be particularly important to incorporate flexible learning options for mature learners.

*“Apprenticeships provide a good model for flexibility - one standard can meet a diverse set of needs and provide flexibility.”* Provider organisation

505. Although in the main flexibility was felt to be important, there was a small group of attendees who cautioned against incorporating flexibility at the expense of diluting the standards or compromising quality. It was also noted that it would be important to clarify how funding arrangements would work in the context of a flexible approach.

*“Qualifications need currency for transferability. Too many flexibilities will dilute.”* Employer organisation

## Delivery of HTE

### Question 3: Are the following suitable markers of high-quality technical provision and are there other criteria to consider?

506. Attendees were asked to consider the following markers of high-quality HTE:

- Expanding on key elements of the current OfS registration conditions.
- Suitably qualified and experienced teachers and leaders.
- Strong links with employer networks.
- Access to facilities and equipment that are reflective of the workplace.
- Drawing from the IoT assessment process, using criteria including supporting regional and national economic growth, employer engagement, relevance to occupational skills needs and quality industry relevant teaching.

507. A large number of attendees felt that there was a risk of duplicating what they felt to be already rigorous regulatory processes in place to ensure quality of qualifications. It was felt that implementing additional systems would cause confusion and could be burdensome for providers.

*“This is an additional layer of approval. It’s burdensome and costly.”*  
Provider organisation

508. Attendees also raised the following challenges in relation to the proposed criteria:

- **Teaching staff:** this was the area of the proposed criteria where attendees raised most challenges. It was felt that staffing was a challenge for both FE providers (e.g. inability to pay wages that are comparative to HEPs) and for HEPs (e.g. staff often lacking industry experiences).

- **Provider size:** it was felt that the criteria could be disproportionately challenging for smaller HEPs or FE providers who may not be able to purchase facilities and equipment that are reflective of the workplace or develop employer networks.

*“Meeting OfS conditions could be problematic, particularly for smaller FE colleges or independent providers, where HTE is only a small part of their provision. This might lead to closures, job losses etc.”* Provider organisation

- **Relationship between FE providers and HE providers:** concerns were raised that the criteria could encourage FE providers to register with the OfS in their own right, instead of continuing their validating arrangement with a HEP. This could have the effect of reducing levels of collaboration within the sector.
- **Definition and measurement:** attendees raised concerns about how some of the criteria (e.g. suitably qualified teaching staff) would be defined and measured.

#### **Question 4: What non-financial support might providers need to develop their workforce and engage with employers?**

509. There was limited discussion around this question at the consultation events. Amongst the feedback provided there were three main ways attendees felt that providers could be supported to develop their workforce and engage with employers:

- National awareness raising amongst employers about the importance of the role they can play.
- Mechanisms for networking and sharing good practice across providers (e.g. workshops and online resources).
- Provision of information and guidance to support engagement with employers and other stakeholders to help providers demonstrate the local offer, for example with LEPs and Chambers of Commerce.

#### **Question 5: We welcome ideas on: a) how providers could best allocate their existing resources to build and support capacity to deliver approved HTQs and b) where additional help may be needed.**

510. Only a small number of suggestions were made in relation to this question. These included:

- Increasing the extent to which employers are able to access funding from the apprenticeship levy.
- Ensuring learning from investment in other technical education (e.g. T Levels) is utilised within HTQs.
- Considering processes for greater collaboration between providers, for example sharing equipment.

## Student and employer demand

### Question 6: To what extent do you agree with the following measures to improve the profile of HTE.

511. Attendees were asked to consider the following measures to improve the profile of HTE:

- Having a clear product identity promoted through a campaign.
- Being recognised in school and college destination measures and amongst employers.
- Building on the existing prestige of high-quality providers and professional bodies.

512. Attendees were also asked what else could improve the profile of HTE. The majority of attendees raised the point that ensuring demand for HTE would be key to the success of the proposed reforms and that the measures in the first three bullet points would be central to generating this demand. Key points of feedback included:

- **Product identity and promotion:** establishing a clear brand and identity was felt to be important in generating demand for and improving the perception of HTE. Promotional activity would need to be targeted at teachers, parents and all ages of potential learners. It was felt to be important to use role models and positive case studies of HTE students within any promotional campaign. A small number of attendees noted the success of the apprenticeship campaign in increasing take-up.

*“Case studies and peer to peer information are very effective. Something that shows where the qual can take you in terms of money and interesting work.”* Local government

- **School IAG:** it was felt to be important to increase the understanding of teachers and school staff involved in IAG, in order to ensure that pupils have sufficient information about different pathways.

*“We need consistent messages from primary school onwards, young people really need exposure to the full range of options they have at secondary school, FE and beyond.”* Charitable organisation

### Question 7: To what extent do you agree with the following proposals to improve IAG and the application process for young people, adults and employers.

513. Attendees were asked to consider the following measures to improve IAG and the application process for young people, adults and employers:

- Working with the Careers & Enterprise Company, Career Development Institute and UCAS.
- Working with the National Careers Service and professional bodies to improve IAG.

- Improving employer understanding of HTE by working with LEPs, Growth Hubs and the National Apprenticeships Service.

Attendees were also asked in what other ways could we help fill the HTE information gap for these groups and encourage more applications?

514. There was limited feedback provided by consultation event attendees around the above bullet points and attendees often reiterated points made in answer to previous questions. This included:

- The need for promotional campaigns to raise awareness and increase the perception of HTE.
- The benefits of having flexible, modular learning for mature learners.
- The need for improved IAG within schools and available to mature learners.

*“We need coherent careers strategy and advice with consistent and clear messages. This needs to be available throughout your life as you step on and off qualifications.”* Provider organisation

- The need for a clear system of application (e.g. using UCAS for level 4/5).

### **Question 8: What more can government do to improve access and help support students (incl. from disadvantaged backgrounds) to undertake and complete a HTQ?**

515. There was only limited feedback provided by attendees in relation to this question. Where the question was answered, responses focussed on two areas:

- **Financial support:** attendees noted that financial support for both students and providers would be important in ensuring uptake and completion of HTQs. It was felt that funding to help support with student transport and childcare costs would be beneficial and that it was important to ensure that funding arrangements for HTQs are comparable to those available for apprenticeships.

*“As a radical option to boost access and get HTE off the ground grants could be offered to support students. In particular, you need a financial incentive that can compete with what apprenticeships offers (no loan debt etc.)”* Provider organisation

- **Learning format:** opportunities to undertake learning remotely and online were felt to be important, especially for students in rural areas. Having the flexibility to do smaller and modular qualifications was also reiterated as a way of improving access to HTQs, particularly for mature learners who plan to study alongside employment.

# Appendix Five: HTE consultation questionnaire

## Higher technical education consultation

### Overview

We are seeking views on our proposed reforms to higher technical education in England.

### Why we are consulting

The proposals in this consultation cover higher technical education in England. Specifically, the consultation sets out our proposed approach to creating a system of employer-led national standards and invites views on the principles and processes underpinning this.

It also sets out our approach to ensuring high quality provision of higher technical education and the steps we propose to take to stimulate demand for higher technical qualifications. It invites views on these.

### Introduction

#### 1 Welcome. What is your name?

Name

#### 2 Would you like to provide your email address?

Email:

#### 3 Are you responding as an individual or on behalf of an organisation?

Please select only one item

- Individual
- Organisation

#### 4 What is your organisation?

*(Required)*

Please select only one item

- Further Education
- Higher Education
- Awarding Body
- Alternative provider
- Student
- Parent/ Carer
- Employer
- Other (please specify)

Organisation

#### 5 What local authority area are you based in?

Please state *(Required)*

**6** Would you like us to keep your responses confidential?

Information provided in response to consultations, including personal information, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 2018 or the Environmental Information Regulations 2004.

If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Education will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 2018 and, your personal information will only be used for the purposes of this consultation. Your information will not be shared with third parties unless the law allows it.

You can read more about what the DfE does when we ask for and hold your personal information in our [personal information charter](#).

*Please select only one item*

Yes

No

Reason for confidentiality

## Higher technical qualifications (HTQs)

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

Our vision is for higher technical education (HTE) to be a prestigious choice that delivers high levels of occupational competence and supports entry to skilled employment, for those seeking to enter industry or progress within an existings career. This means that the aims of HTQs should be to:

- a) Deliver the knowledge, skills and behaviours that are needed for an occupation(s) and valued by employers.
- b) Be understood and recognised as high-quality by employers and so have labour market currency.
- c) Give students confidence that qualifications are recognised by employers and are seen as a credible and prestigious alternative to other options such as direct entry to a degree or apprenticeships.

*Please select only one item*

- Strongly agree
- Agree
- Neither Agree or disagree
- Disagree
- Strongly disagree

### 8 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?

If yes please provide your views

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

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

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

**10** 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).

- 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 straight forward process for submission, appraisal and decision making
- e. Other (please specify)

	a. A clear mark of labour market relevance	b. A competitive funding package	c. Enhanced information, advice and guidance	d. A swift and straightforward process	e. other (please specify)
1 Most important <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2 <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3 <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4 <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5 Least important <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any specific views on points a-e.

## Higher technical qualifications (HTQs)

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

Our intention is to establish a flexible system for qualification approval. As described above, Awarding Bodies will be able to choose whether to submit their qualifications for Institute approval against a standard, with clear incentives to do so (as set out in paragraphs 29-32). This model – approval of qualifications against the knowledge, skills and behaviours in a single occupational standard – is the core model we are proposing. However, we want to understand whether there is demand for additional features including:

- a) Flexibility include additional content: it may be beneficial for Awarding Bodies to include a certain amount of occupationally-relevant content in a qualification, which is not aligned to occupational standards. This could respond to specific local and sectoral skills needs or reflect innovative or emerging practices. We are considering to what extent this added value outweighs the dilution of qualification focus and purpose, and whether there should be a limit on such additional content;
- b) Broader qualifications: whether there is business need for qualifications to be able to cover the knowledge, skills and behaviours in more than one occupational standard;
- c) Smaller qualifications: whether there is value in Institute approval of smaller, more specialised awards that might cover some but not all of the knowledge, skills and behaviours in a relevant occupation;
- d) Flexible learning: whether and how modules or smaller qualifications should be approved by the Institute to allow students, especially adults, to step on and off of their course;
- e) Other requirements: whether it would be beneficial for the Institute to require proficiency in the following, alongside HTQs;
  - (i) Other requirements: Maths
  - (ii) Other requirements: English
  - (iii) Other requirements: Digital skills
  - (iv) Other essential transferable and employability skills
  - (v) Alignment with professional body standards
  - (vi) A period of work-based learning.

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
a. Flexibility to include additional content. <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Broader qualifications <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Smaller qualifications <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Flexible learning <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(i) Other requirements: Maths <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(ii) Other requirements: English <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(iii) Other requirements: Digital skills <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(iv) Other essential transferable and employability skills <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(v) Alignment with professional body standards <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e.(vi) A period of work based learning <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

**12** 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

### Delivery of higher technical education (HTE)

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

Please select

*Please select only one item*

Yes

No

- Suitably qualified and experienced teachers with current, relevant occupational and industry experience and expertise, as well as high quality pedagogical skills. Leaders have the capacity and ability to ensure provision is sustainable and retains a clear focus on quality
- Strong links with employer networks, thus ensuring the knowledge, skills and behaviours being delivered are valued by, and relevant to, employers who are engaged and investing in training; and
- Learning environments that provide access to facilities and equipment that are reflective of the workplace, including industry-relevant, up-to-date equipment.
- A range of criteria similar to that used in the IoT assessment process, which included evidence of; support for regional and national economic growth; employer engagement; relevance to occupations skills needs; and quality industry relevant teaching.

Give reasons for why or why not

**14** 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

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

#### Delivery of higher technical education (HTE)

**15** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

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

Please provide comments

**17** What specifically would additional funding support?

Please provide comments

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

Please provide comments

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

Please provide comments

**20** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

What might examples of non-financial support be?

**21** 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.

Please provide comments

**22** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Why?

## Student and employer demand

**23** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

Please provide examples from your experience:

**24** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Please provide any additional ideas

## Student and employer demand

**25** 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?

*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

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

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

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

**26** 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?

Please provide comments

### Wider impact

**27** 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

**28** Do you have any other comments?

Please provide comments

## Appendix Six: Quantitative tables

Question 7. To what extent do you agree or disagree with the proposed aims of HTQs set out below (n=128 responses)

	Strongly Agree	Agree	Neither Agree or disagree	Disagree	Strongly disagree
<b>Total</b>	<b>66</b>	<b>56</b>	<b>4</b>	<b>2</b>	<b>0</b>
<b>Percentage</b>	<b>52%</b>	<b>44%</b>	<b>3%</b>	<b>2%</b>	<b>0%</b>
Awarding body	2	9	1	0	0
Education	12	6	0	0	0
Employer	6	1	0	0	0
Professional/business organisation	16	16	1	2	0
Provider (FE)	19	4	0	0	0
Provider (HE)	7	19	2	0	0
Other	4	1	0	0	0

Question 9. What is your view on our proposal that, upon approval of a HTQ, there should generally be no transfer of copyright? (n=118 responses)

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
<b>Total</b>	<b>30</b>	<b>42</b>	<b>44</b>	<b>2</b>	<b>0</b>
<b>Percentage</b>	<b>25%</b>	<b>36%</b>	<b>37%</b>	<b>2%</b>	<b>0%</b>
Awarding body	8	0	3	0	0
Education	1	5	12	0	0
Employer	0	1	5	1	0
Professional/business organisation	5	12	12	0	0
Provider (FE)	5	12	5	0	0
Provider (HE)	11	11	4	1	0
Other	0	1	3	0	0

**Question 11a. Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. a. Flexibility to include additional content. (n=122 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>79</b>	<b>37</b>	<b>5</b>	<b>0</b>	<b>1</b>
<b>Percentage</b>	<b>65%</b>	<b>30%</b>	<b>4%</b>	<b>0%</b>	<b>1%</b>
Awarding body	8	3	0	0	0
Education	14	3	1	0	0
Employer	2	5	0	0	0
Professional/business organisation	21	10	1	0	0
Provider (FE)	18	5	0	0	0
Provider (HE)	15	10	2	0	1
Other	1	1	1	0	0

**Question 11b. Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. b. Broader qualifications (n=120 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>55</b>	<b>47</b>	<b>16</b>	<b>2</b>	<b>0</b>
<b>Percentage</b>	<b>46%</b>	<b>39%</b>	<b>13%</b>	<b>2%</b>	<b>0%</b>
Awarding body	3	5	2	0	0
Education	8	6	3	1	0
Employer	5	0	2	0	0
Professional/business organisation	17	11	4	0	0
Provider (FE)	12	11	0	0	0
Provider (HE)	9	13	4	1	0
Other	1	1	1	0	0

**Question 11c. Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. c. Smaller qualifications (n=120 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>44</b>	<b>46</b>	<b>24</b>	<b>6</b>	<b>0</b>
<b>Percentage</b>	<b>37%</b>	<b>38%</b>	<b>20%</b>	<b>5%</b>	<b>0%</b>
Awarding body	5	5	0	1	0
Education	6	3	8	1	0
Employer	1	2	2	1	0
Professional/business organisation	11	17	3	1	0
Provider (FE)	12	10	1	0	0
Provider (HE)	7	9	9	2	0
Other	2	0	1	0	0

**Question 11d. Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. d. Flexible learning (n=121 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>78</b>	<b>34</b>	<b>6</b>	<b>3</b>	<b>0</b>
<b>Percentage</b>	<b>64%</b>	<b>28%</b>	<b>5%</b>	<b>2%</b>	<b>0%</b>
Awarding body	7	4	0	0	0
Education	10	4	3	1	0
Employer	5	1	0	1	0
Professional/business organisation	24	7	1	0	0
Provider (FE)	17	6	0	0	0
Provider (HE)	13	11	2	1	0
Other	2	1	0	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(i) Other requirements: Maths (n=118 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>25</b>	<b>42</b>	<b>33</b>	<b>13</b>	<b>5</b>
<b>Percentage</b>	<b>21%</b>	<b>36%</b>	<b>28%</b>	<b>11%</b>	<b>4%</b>
Awarding body	2	2	5	1	1
Education	3	5	6	4	0
Employer	4	2	0	1	0
Professional/business organisation	5	12	11	0	2
Provider (FE)	4	10	4	3	1
Provider (HE)	6	9	7	4	1
Other	1	2	0	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(ii) Other requirements: English (n=117 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>25</b>	<b>42</b>	<b>34</b>	<b>12</b>	<b>4</b>
<b>Percentage</b>	<b>21%</b>	<b>36%</b>	<b>29%</b>	<b>10%</b>	<b>3%</b>
Awarding body	2	2	5	1	1
Education	4	3	8	3	0
Employer	3	3	0	1	0
Professional/business organisation	6	10	12	0	1
Provider (FE)	3	12	3	3	1
Provider (HE)	6	10	6	4	1
Other	1	2	0	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(iii) Other requirements: Digital skills (n=118 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
Total	29	53	27	7	2
Percentage	25%	45%	23%	6%	2%
Awarding body	1	4	4	1	1
Education	6	8	3	0	0
Employer	4	2	0	1	0
Professional/business organisation	8	10	13	0	0
Provider (FE)	2	14	3	2	1
Provider (HE)	7	14	3	3	0
Other	1	1	1	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(iv) Other essential transferable and employability skills (n=118 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>47</b>	<b>48</b>	<b>16</b>	<b>6</b>	<b>1</b>
<b>Percentage</b>	<b>40%</b>	<b>41%</b>	<b>14%</b>	<b>5%</b>	<b>1%</b>
Awarding body	4	4	2	0	1
Education	8	6	3	1	0
Employer	5	1	0	1	0
Professional/business organisation	12	12	6	0	0
Provider (FE)	9	12	1	0	0
Provider (HE)	8	12	3	4	0
Other	1	1	1	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(v) Alignment with professional body standards (n=120 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>58</b>	<b>44</b>	<b>14</b>	<b>3</b>	<b>1</b>
<b>Percentage</b>	<b>48%</b>	<b>37%</b>	<b>12%</b>	<b>3%</b>	<b>1%</b>
Awarding body	6	3	1	0	1
Education	7	7	2	2	0
Employer	3	3	1	0	0
Professional/business organisation	19	9	3	0	0
Provider (FE)	12	9	2	0	0
Provider (HE)	10	11	5	1	0
Other	1	2	0	0	0

**Question 11e Would you support incorporating the flexibilities/requirements in the statements (listed below) in the Institute approval process. e.(vi) A period of work-based learning (n=116 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>34</b>	<b>36</b>	<b>28</b>	<b>13</b>	<b>5</b>
<b>Percentage</b>	<b>29%</b>	<b>31%</b>	<b>24%</b>	<b>11%</b>	<b>4%</b>
Awarding body	3	4	2	1	1
Education	5	5	6	1	0
Employer	5	1	1	0	0
Professional/business organisation	7	11	7	2	2
Provider (FE)	6	8	5	3	0
Provider (HE)	7	6	7	5	2
Other	1	1	0	1	0

**Question 13. Are the suggested criteria suitable markers of high-quality technical provision? (n=121 responses)**

	<b>Yes</b>	<b>No</b>
<b>Total</b>	<b>115</b>	<b>6</b>
<b>Percentage</b>	<b>95%</b>	<b>5%</b>
Awarding body	9	0
Education	18	0
Employer	7	0
Professional/business organisation	29	4
Provider (FE)	23	0
Provider (HE)	26	2
Other	3	0

**Question 14. 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? (n=120 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>22</b>	<b>46</b>	<b>21</b>	<b>19</b>	<b>12</b>
<b>Percentage</b>	<b>18%</b>	<b>38%</b>	<b>18%</b>	<b>16%</b>	<b>10%</b>
Awarding body	1	3	1	2	2
Education	4	7	6	0	0
Employer	2	3	0	1	0
Professional/business organisation	9	10	5	5	3
Provider (FE)	2	10	6	5	0
Provider (HE)	4	10	3	6	6
Other	0	3	0	0	1

**Question 15. 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? (n=82 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>27</b>	<b>31</b>	<b>17</b>	<b>6</b>	<b>1</b>
<b>Percentage</b>	<b>33%</b>	<b>38%</b>	<b>21%</b>	<b>7%</b>	<b>1%</b>
Awarding body	2	2	2	1	0
Education	1	2	2	0	0
Employer	2	1	0	0	0
Professional/business organisation	8	7	5	3	1
Provider (FE)	6	8	2	0	0
Provider (HE)	7	10	6	2	0
Other	1	1	0	0	0

**Question 20. 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? (n=119 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>50</b>	<b>54</b>	<b>10</b>	<b>4</b>	<b>1</b>
<b>Percentage</b>	<b>42%</b>	<b>45%</b>	<b>8%</b>	<b>3%</b>	<b>1%</b>
Awarding body	2	7	1	0	0
Education	6	7	3	1	0
Employer	3	4	0	0	0
Professional/business organisation	16	14	2	1	0
Provider (FE)	11	10	1	1	0
Provider (HE)	12	10	2	1	1
Other	0	2	1	0	0

**Question 22. 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? (n=112 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>31</b>	<b>40</b>	<b>29</b>	<b>7</b>	<b>5</b>
<b>Percentage</b>	<b>28%</b>	<b>36%</b>	<b>26%</b>	<b>6%</b>	<b>4%</b>
Awarding body	0	3	1	2	3
Education	4	6	5	1	0
Employer	2	3	2	0	0
Professional/business organisation	8	8	8	3	2
Provider (FE)	7	11	5	0	0
Provider (HE)	10	8	7	1	0
Other	0	1	1	0	0

**Question 23. 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? (n=125 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
Total	80	36	8	1	0
Percentage	64%	29%	6%	1%	0%
Awarding body	8	2	1	0	0
Education	13	4	1	0	0
Employer	6	1	0	0	0
Professional/business organisation	23	10	3	0	0
Provider (FE)	17	6	0	0	0
Provider (HE)	10	13	3	1	0
Other	3	0	0	0	0

**Question 24. To what extent do you agree or disagree with these measures to improve the profile of HTE? (n=121 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
Total	60	54	4	2	1
Percentage	50%	45%	3%	2%	1%
Awarding body	6	4	1	0	0
Education	11	4	1	0	1
Employer	3	3	0	1	0
Professional/business organisation	13	20	1	0	0
Provider (FE)	18	5	0	0	0
Provider (HE)	8	16	1	1	0
Other	1	2	0	0	0

**Question 25. To what extent do you agree or disagree with these measures to improve IAG for young people and their teachers, adults and employers? (n=120 responses)**

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>
<b>Total</b>	<b>57</b>	<b>52</b>	<b>8</b>	<b>1</b>	<b>2</b>
<b>Percentage</b>	<b>48%</b>	<b>43%</b>	<b>7%</b>	<b>1%</b>	<b>2%</b>
Awarding body	4	6	0	0	0
Education	11	4	3	0	0
Employer	2	2	2	0	1
Professional/business organisation	13	19	1	1	0
Provider (FE)	16	5	0	0	1
Provider (HE)	9	15	2	0	0
Other	2	1	0	0	0



Department  
for Education

© Department for Education 2020

**Reference: DfE-00101-2020 RR984**

**ISBN: 978-1-83870-105-5**

For any enquiries regarding this publication, contact us at: [Higher-technical.CONULTATION@education.gov.uk](mailto:Higher-technical.CONULTATION@education.gov.uk) or [www.education.gov.uk/contactus](http://www.education.gov.uk/contactus)

This document is available for download at [www.gov.uk/government/publications](http://www.gov.uk/government/publications)