

This Government Consultation paper, and its accompanying case for change, was launched on 8th July 2019. The Career Development Institute was involved in discussions with the Department of Education during the development of that document. The CDI's continuing role is acknowledged at paragraph 102, where the need for better IAG for people of all ages is discussed. The CDI has also lodged a formal online response to the consultation questions relevant to organisations who do not themselves provide level 4 or 5 qualifications. The questions have been reproduced alongside the response below to provide context for readers.

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 existing 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.

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI strongly agrees.

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?

The CDI welcomes the opportunity for Awarding Bodies to voluntarily submit existing, as well as new qualifications, for approval under the new arrangements. There are likely to be existing vocational qualifications which will meet the requirements as they stand, or with minimal modification. Cost effective adjustments may be possible using building blocks from within new course materials. It is important to maintain stability and familiarity of content where this is working well for employers, students and education providers. This will enable all concerned to focus on addressing the areas where change is vital.

We would ask that appropriate high level direction is provided, and sufficient overview is maintained of the approval of courses in specific areas across all main Awarding Bodies; with a website highlighting approved courses. This would reduce the likelihood of existing qualifications being deemed to be unsuitable purely because they have not completed the approval process at the same time as others. 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.

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

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI neither agrees or disagrees.

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

The CDI believes that others in this market are better placed to comment on this issue. Together they need to develop an approach which protects the interests of learners undertaking courses as well as the commercial interests of Awarding Bodies.

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;

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees even if the facility is not taken up at the outset.

- 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;
Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees.

- 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;
Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees.

- 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.
Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees.

- 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.

The CDI neither agrees or disagrees in respect of sub-paragraphs e(i) to e(vi) above.

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

Others involved in developing these qualifications are better placed to make decisions about the usefulness of such incorporation. Qualifications already exist within the market to cover these aspects and it may be that additional integration is not necessary given that parallel provision.

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

The CDI believes this to be sensible and workable approach.

13. Are the suggested criteria (listed below) suitable markers of high-quality technical provision?

Please select Yes or No – The CDI response is Yes

Suitably qualified, experienced and occupationally competent teachers with 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 and professional bodies, to ensure that 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

Although the CDI agrees that these are suitable markers, these need to be provided alongside appropriate career management and employability skills and high quality careers guidance. These skills should be delivered by appropriately qualified career advisers trained to a minimum L6/7 in careers guidance. and development. Learners not only need to learn the skills needed to work in the identified role within the relevant industry, but also need to develop self-awareness, confidence and resilience to transition into the world of work. They need other career management skills to be successful in the search for jobs, identification of suitable roles and compatible employers and then successfully acquire the job identified.

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

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees.

If you disagree please give reasons

This additional requirement will help reassure learners of the quality of the provision selected.

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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI neither agrees nor disagrees.

a. How might this work to ensure provision best meets local skills needs?

b. What specifically would additional funding support?

c. Would additional costs be a barrier to delivering high quality HTQs, why?

d. Which would be a greater priority for providers: capital or recurrent grant funding? Or both equally? Why?

Please provide any comments below

Others are better placed to comment on what would influence providers to deliver the required high quality provision.

16. 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees

Why?

The CDI believes that investigating this aspect more deeply would better inform the decisions ultimately taken by course providers about which courses to run. It also has the potential to aid course selection by prospective students. However, in exploring this further, care would need to be taken to understand any legitimate reasons for running courses that do not meet the technical conditions prescribed and with that in mind, the detrimental impact that differentials in funding could have on their continued availability.

17. 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

What might examples of non-financial support be?

The CDI neither agrees nor disagrees. Others are better placed to comment on the support required.

18. 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 insert comments here

Others are better placed to comment on what would influence providers to deliver high quality provision.

19. 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly Disagree

The CDI strongly agrees.

Please provide examples from your experience:

Others are better placed to supply specific examples. There are however numerous situations where personal circumstances can affect the ability of an individual worker to continue in their existing role – such as illness, injury or family social dependency. From the employer perspective, workforce retraining may be required when workforce requirements shrink or adapt to the use of new technology or to meet new commercial opportunities. The National Retraining Scheme has been set up to address this recognised need.

20. 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI strongly agrees.

Please provide any additional ideas

Adjustment to the content of national and proprietary career advisory pages will be required to demonstrate the relative benefits and progression and work opportunities as against more prominent and well-known qualifications. All information about specific job roles and progression

routes will also need to be appropriately adjusted. Career development practitioners working in youth and adult careers guidance will have a vital role in educating students, workers and their families on how to evaluate the options going forward as will appropriately trained professionals within the recruitment industry and employers themselves.

21. 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

The CDI agrees with this although wishes to point out that its members are also involved in supporting adults with their career related decisions. As recognised in paragraph 102, the Career Development Institute is the UK-wide professional body for the career development sector, whose members support learners, workers and unemployed people through lifelong career transitions, i.e. when changing, developing or enhancing careers across all age groups from secondary school through to older workers.

In what other ways could we help fill the HTE information gap for: Young people & their teachers

In addition to the steps outlined in the consultation paper, specific provision could be made to include details of the changes within initial teacher training, and in the CPD activities for existing teachers. It would be helpful to include resources to enable career leaders and other to communicate this revised message clearly and succinctly to students, teachers and parents/carers as part of the wider communications activity.

In what other ways could we help fill the HTE information gap for: Adults

Lessons could be learnt from the way in which the communication of the availability of modern apprenticeships was made to the adult workforce. Opportunities also exist through the HR profession CPD, as well as for career advisers, to ensure that those supporting adult learners are clear about the changes and their implications. This could help educate employers as well as individuals on the acceptability of these qualifications.

In what other ways could we help fill the HTE information gap for: Employers

Employing staff with level 4 and 5 qualifications should be beneficial to employers as it could help with the granularity of pay scales, enable employers to take on staff with skills higher than level 3 and provide potential for smaller top up training activity in future. Sharing this information with organisations such as the CBI and the Chamber of Commerce and locally through LAs and LEPs would aid the spread of this message, alongside seeking their cooperation to build case study examples that will accelerate general understanding and acceptance.

22. 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 below

In postgraduate qualifications it is well recognised that people can study on three progressive levels. Certificate are awarded for 60 credits, diplomas for 120 credits and a full Master's degree with 180 credits. These qualifications work well as a continuous flow or discontinuous development using accredited prior learning. Level 4 to 5 qualifications would be more attractive and flexible to meet the needs of a range of people if they were offered as similar building blocks to next level qualifications, up to and including a full degree. This would also provide exit qualifications providing recognition for the learning achieved short of a full degree. Career advisers would have clearer information and options to provide to support learners. This new flexibility would benefit learners by minimising risks associated with embarking on longer courses.

23. 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

Others are better placed to comment on this potential impact.

24. Do you have any other comments?

Please provide comments

Whilst improvements in this area are welcomed and their likely impact acknowledged, it is important to recognise that these changes will take place at the same time as many other changes are occurring in this sector. This includes addressing the recommendations from the Auger review, the introduction of T levels and the review of the continuation or replacement of other level 3 qualifications. Not only will it be important to ensure that these changes dovetail together when fully implemented, but also to recognise the strain on resources additional changes will impose with many of the same players in the market, particularly in further education colleges.

It is important is that quality improvements are made in sensible and manageable stages, pausing as necessary to ensure stability, clarity and ease of transition into the workplace or next step qualifications for the learner. That emphasis is crucial, ranking above the setting of a specific timeline to achieve stated milestones. Sensible revisions of timescales need to be considered as the effectiveness of implementation is reviewed over time. CDI members can help to provide ongoing information about how well the changes are embedding across all age groups.