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Response to Department for Education consultation on Higher Technical Qualifications

Response submitted: 28th September 2019

Section 1: Higher technical qualifications (HTQs)	
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	Strongly agree

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.	-
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	-
What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?	-
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)	-
Please provide any specific views on points a-e.	-
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 to 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. Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Strongly agree Occupational standards are a useful way of setting out IfATE's expectations of a course but the content needs to be flexible to adapt to emerging and/or local skills needs. There is a huge risk in making standards too prescriptive around content. Qualifications need to facilitate the rapid pace of change as new technologies emerge and industry practice evolves. This flexibility is even more important for higher technical qualifications, where learners will be expected to have more advanced and specific knowledge/expertise, than for T-levels. The content of Level 4 and 5 digital and media qualifications, for example, will need to change rapidly in line with technology. The standards must be flexible enough to accommodate this. It is equally crucial that qualifications can be adapted to meet local skills needs or specific sectoral needs. Greater Manchester has identified its key skills needs, aligned to its local industrial strategy. We need to be able to work with local employers and our awarding bodies to co-design approved HTQs that meet these skills needs. We would also highlight the importance of employer-sponsored programmes. FE and FE/HE providers like us have a very strong track record of working with local employers to co-design and continually re-imagine programmes so that they are always relevant and up to date. This is vital at Levels 4 & 5, as well as Level 3. The HTQ curriculum needs to combine academic core knowledge and technical training and expertise. Both elements need to be flexible enough to cater to rapid changes and new technologies, as well as local and specific sectoral skills needs. *Suggested solution:* The required flexibility could be incorporated into the standards by focusing on learning outcomes rather than specific content. This flexibility would also enable learners to gain real-life, industry-standard experience – for example, by following live briefs from employers or delivering a major project for their final assessment.

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. Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Agree Many careers require learners to have knowledge, skills and behaviour that span more than their own core sector so they understand the context in which they are operating. This could potentially span more than one occupational standard. For example, learners doing HTQs on construction and the built environment need to understand their sector's relationship to other sectors. Engineers may need to be able to apply their skills in a sector that falls within a different occupational standard. Public services students need leadership and management skills, as well as technical knowledge and skills specific to careers in the public sector.
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. Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Strongly agree There is a growing demand for this from employers and learners and it is an ideal way to fill skills gaps and enable people to upskill and reskill as the jobs market changes. Local employers and commissioners (e.g. combined authorities / local authorities) are keen to commission short courses to fill specific Level 4 & 5 skills gaps – this includes skills top-ups for people who are already in work but who may need, for example, a new Level 4 digital skill in addition to their current skills. Smaller qualifications would also facilitate people in work to self-manage their own learning, either for continuing professional development or with a view to changing career. There is a demand from learners who are in work and keen to upskill but unable to commit to a large qualification in one go. Small bite-sized courses where they could accumulate credits over time – for example, by doing a series of individual qualifications of up to 10 credits part-time over six or 12 weeks – would make it much easier for people who are in work to re-engage with learning. They could then transfer these credits to a larger qualification. Similarly, SEND learners may find it more manageable to complete a series of smaller, phased qualifications at their own pace. This could be linked to 'just in time' learning such as online tutorials that enable people to refresh their skills and keep up to speed in fast-changing areas such as coding, marketing and cybersecurity. This doesn't just apply to people working in digital sectors – the Construction Industry Training Board (CITB) digital strategy highlights the need to upskill staff at all levels and across all areas of the construction industry, from senior leaders in the national/multinationals to small contractors.

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. Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Strongly agree. Step-on, step-off flexibility is crucial. Offering smaller qualifications and/or recognising individual modules with an award/qualification would make it much easier for people to gain valuable Level 4 & 5 skills, especially those who are already in the workplace or who have family responsibilities that mean they cannot commit to a full qualification in one go. This flexibility would suit people who need to upskill in one module specific to their employers' skills needs, as well as learners who want to gain a larger qualification over a period of time. Small bite-sized courses where learners could accumulate credits over time – for example, by doing a series of individual qualifications (e.g. 10 credits) part-time over six or 12 weeks – would make it much easier for people who are in work to re-engage with learning. Similarly, SEND learners may find it more manageable to complete a series of smaller, phased qualifications at their own pace. They could then transfer these credits to a larger qualification. Progression beyond Levels 4 & 5 is also vital. There is strong demand from learners and employers for top-up qualifications, including the ability to top up HTQs into degree-level qualifications. Each year, around 200 of our Level 5 learners progress onto a Level 6 top-up to gain a degree. It is important for learners to be able to do this and the availability of a degree-level qualification also increases the prestige of technical and vocational education. For example, learners who have completed a Level 5 foundation degree in computer network engineering can come back later and complete a one-year top-up to achieve a BSc in network administration with cloud computing. We would therefore propose that every Level 4 & 5 should have an option for a Level 6 top-up or outcome to enable parity with academic outcomes. Course content at Levels 4 and 5 would need to lay the foundations for progression to Level 6 – for example, by building in an appropriate understanding of research, suitable for Level 4 or 5. *Student case study: Reskilling adult learners for highly-technical roles* Many former soldiers struggle to adjust to civilian life and find a new career outside the Army. Ex-soldier Joe*, however, is now a highly-skilled network technician fitting

	sophisticated Cisco IT equipment in some of the world's most expensive superyachts, thanks to higher technical training at LTE Group t/a UCEN Manchester. He completed a Foundation Degree in Computer Networks, with Cisco CCNA at the heart of the course. Gaining his Level 5 qualification inspired Joe* to progress to a Level 6 top-up degree in Network Administration with Cloud Computing, and he hasn't looked back since. *Name has been changed
e) Other requirements: whether it would be beneficial for the Institute to require proficiency in the following, alongside HTQs. **(i) Other requirements: Maths** Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Agree We agree in principle but the required level of proficiency will depend on the qualification in question. Functional maths will be appropriate for many courses but some Level 4 & 5 courses (e.g. computing) may require more advanced maths. It needs to be carefully balanced: course content needs to lay the appropriate groundwork for progression to higher-level learning, while not setting unreasonably high expectations that unfairly penalise otherwise excellent students, including those with specific learning difficulties.
(ii) Other requirements: English Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Agree We agree in principle but the required level of proficiency will depend on the qualification in question. Functional English will be appropriate for many courses but some Level 4 & 5 courses (e.g. legal courses) may require more advanced English. It needs to be carefully balanced: course content needs to lay the appropriate groundwork for progression to higher-level learning, while not setting unreasonably high expectations that unfairly penalise otherwise excellent students, including those with specific learning difficulties. Someone with dyslexia could be an excellent Formula 1 engineer but find that the HTQ they need is out of reach if the English requirements are too high.

(iii) Other requirements: Digital skills Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Agree We agree in principle but the required level of proficiency will depend on the qualification in question. Functional digital skills will be appropriate for many courses but some Level 4 & 5 courses (e.g. computing or digital marketing) may require more advanced skills. It needs to be carefully balanced: course content needs to lay the appropriate groundwork for progression to higher-level learning, while not setting unreasonably high expectations that unfairly penalise otherwise excellent students, including those with specific learning difficulties.
(iv) Other essential transferable and employability skills Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Strongly agree Transferable and employability skills are crucial. As well as the softer skills valued by employers – e.g. listening and problem-solving – there is merit in course content on managing your own professional profile and on personal finance to help learners gain the most benefit from their studies, their job opportunities and their income over their lifetime. Opportunities for learners to engage in team-working and broaden their experience of working with others is also very important. We note that 60% of employers surveyed for the CBIs' education and skills survey 2018 said that broader skills such as resilience, communication and problem-solving were in their top three priorities when recruiting. However, the requirements need to take account of the fact that what makes someone 'employable' will vary between occupations. Someone with an autism spectrum disorder could be highly employable in their chosen career but they may struggle with social interaction.

(v) Alignment with professional body standards	Strongly agree
Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Co-accreditation (wherever possible) is crucial to encouraging learners to pursue higher technical education and to them securing employment afterwards. It is also crucial to employer buy-in and support for HTQs. Further, there seems little point in creating new HTQs as rivals to existing qualifications that are already highly-regarded, recognised as industry-standard and accredited by the relevant professional bodies. We work with a number of professional bodies and offer courses aligned to their standards (eg AAT, CIM, CIPD, Cisco and CILEx) so that our Level 4 & 5 learners gain their licence to practise as well as gaining a HTQ. There is a definite demand for this form of alignment to professional body standards. (We are also looking at opportunities to offer learners on foundation degrees in business and management to gain a CIPD qualification alongside their foundation degree.)

(vi) A period of work-based learning Indicate: Strongly agree / Agree / Neither agree or disagree / Disagree / Strongly Disagree Are there any specific points you would like to raise in relation to the above. Please state below.	Neither agree or disagree We agree that Level 4 & 5 learners need to gain relevant, real-life industry experience. However, many learners at those levels will already be in work or have work-based experience linked to their area of study. Higher technical qualifications need to offer learners strong links to employers and real contact with industry but requiring a specific period of work-based learning is too narrow and prescriptive and will not be appropriate in many cases. Some learners are on employer-sponsored programmes, for example. The standards need to be flexible enough to accommodate different models of work-based learning. A well-designed curriculum could include reflective practice (particularly for learners who are already in work), live briefs from local employers and a professional learning environment (or even a virtual learning environment) that enables learners to understand what being in the workplace is really like. While some form of placement may be important for learners who don't have any work experience, it would need significant additional investment to be successful. Finding and arranging placements is resource-intensive for providers; providing placements is resource-intensive for employers. We have concerns that the supply of employers willing to offer work-based learning may be exhausted by T-levels and other pre-existing policies.
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.**	Appropriate resources will need to be put in place to support any shift in regulatory responsibility from Ofqual to the OfS e.g. if more providers are required to register with OfS because 'non-prescribed' courses have successfully applied to become 'approved' qualifications. (OfS capacity already appears stretched by the recent expansions to its powers and workload, resulting in long delays in the approval of material that colleges need to communicate to students.)

Section 2: Delivering higher technical education	
Are the suggested criteria (listed below) suitable markers of high-quality technical provision? **Please select 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.	Yes
Give reasons for why or why not.	Yes, in principle. It is unclear how they will be assessed in practice, however. Providers are already assessed for the quality of their technical provision and the time/resources they need to invest in additional regulatory requirements is time/resources taken away from frontline teaching. Any additional requirements must actually be deliverable. FE college and College-based HE providers like us have highly-specialist expertise, gained over many decades, in delivering high-quality technical education. We are rooted in our local

communities, giving local people skills and careers for life, and working collaboratively with local schools, employers, LEPs and civic leaders to meet current and future skills needs. It is vital that FE and College-based HE providers are not priced out of the HTQ market by unrealistic expectations that DfE is not prepared to fund.

For example, incentives may be needed to attract staff that meet the criteria: FE teacher salaries are not just substantially below the industry average for many highly-technical careers; they are also £7k a year lower than schoolteacher salaries. Capital funding for FE colleges has been woefully inadequate for many years, leaving many with outdated equipment and IT that they cannot afford to replace. This is in stark contrast to the national investment in school buildings and IT, and the investment that universities have been able to afford thanks to tuition fee increases and uncapped student numbers.

High-quality, personalised student support should be another key requirement with in the criteria. This is currently missing from the list, despite its importance in ensuring learners receive a high-quality education and are able to gain the full benefit from their studies.

We would also like to see recognition of professional technical staff on a par with academic colleagues in the section on suitably-qualified and experienced teachers. These are staff who may not have a teaching background but who bring invaluable hands-on knowledge and expertise and play a crucially important role in students' learning.

For sectors where portfolio careers are the norm – for example, film and creative media – we would like to see further development of professional pathways that recognise and accredit teachers who continue to practise in industry alongside their teaching role (i.e. dual-professional and multi-professional roles). These roles need to be properly remunerated to attract and retain professionals with the right skills and expertise.

Finally, we are pleased to see support for regional and national economic growth included in the criteria. We would like to see this expanded to highlight the importance of providers responding to local industrial strategies and labour market intelligence. It is also important that the criteria do not create barriers for the most

disadvantaged students or adult returners by requiring them to travel to other regions to access higher technical education or jobs in their chosen sector, unless they choose to do this.

Student case study: The value of FE's local roots and employer links

Amber* began the Foundation Degree in Film and TV Production at The Manchester Film School (part of LTE Group t/a UCEN Manchester) when she was 24. After demonstrating her talent on work placements arranged through our strong contacts in Manchester's creative industries, Amber* rapidly began securing paid work with local production companies alongside her studies. At the end of her Level 5 studies, she joined a major local production company as an in-house camera operator.

Single mother Amber* wasn't content to leave her studies there, however. She combined her busy career and childcare responsibilities with studying for a Level 6 top-up degree part-time and building a work relationship with a leading advertising agency. Amber* graduated with a first-class BA in Creative Media & Visual Communication, having directed nearly 40 TV and online commercials for the agency. By 28, she had been promoted to Director of Content there and now mentors two of our current female students, as well as offering numerous work placements.

*Name has been changed

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	Agree

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	Agree
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.**	a) Greater devolution is key. Greater Manchester has strong partnership working in place with employers, providers, the combined and local authorities, the LEP etc working closely together on the Local Industrial Strategy and education and skills needs. This partnership working can be seen as an exemplar for other areas to follow. Devolution of the Adult Education Budget has been a start but greater devolution of education/skills powers and funding is required to enable Greater Manchester to gain the full economic benefits anticipated in the LIS. This could facilitate the piloting of localised solutions – for example, greater investment in employer-sponsored programmes or in dual-professional roles to ensure learners are taught by people with current industry experience as well as teaching expertise. b) Additional capital funding would support investment in the required industry-standard, up-to-date equipment and facilities (see our response to the question on criteria for providers). Additional revenue funding would help providers to attract industry experts and teachers with the right level of technical knowledge and experience. c) The costs of providing higher technical education shouldn't be a barrier but it needs fair and appropriate funding. As mentioned above, it depends on how these criteria are further defined. Industry-standard equipment and high-quality teaching from people with relevant and recent experience cost money so it is important not to set these requirements at a threshold higher than DfE is willing to fund. Equipment will be a recurrent cost as it will need to be replaced/upgraded regularly to remain "industry-standard and up to date". Equally, it cannot be assumed that off-site access would be available (e.g. in businesses) if DfE

	decides on-site access is unaffordable – many places won't have a sufficient supply of local employers willing or able to provide this sort of access. Providers that want to deliver approved HTQs will also face the additional recurrent costs associated with recruiting and retaining suitably-qualified staff, as well as completing OfS registration and demonstrating ongoing compliance with the requirements. d) Both are equally important for the reasons given above.
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	Strongly agree
Why?	We strongly agree in principle. Funding is key and the current student finance regime, combined with the removal of the cap on HEI student numbers, have incentivised the expansion of HEIs and full-time degrees and dis-incentivised Level 4 & 5 technical education. 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. However we have a range of concerns about the impact on funding for non-approved qualifications in fields where an approved HTQ is not an option. This includes higher technical qualifications in occupations for which there are currently no route panels – for example, the performing arts. New occupational maps and route panels need to be established so that these qualifications can be submitted for approval as HTQs.

	We also have concerns about the potential impact on Advanced Learner Loan-funded provision for non-approved qualifications. The consultation document merely says that the impact will be considered "following the close of the consultation" (para 59, p26).
	Funding needs to be available for courses that enable people to access approved HTQs without having had to have done a T-level. This is particularly important for adult learners – removing funding for these stepping-stone qualifications would put barriers in the way of people trying to gain the skills that employers need. The Independent Review of Post-18 Education and Funding (pp51-54) makes clear the significant decline in adult enrolments at Level 3 since 2011/12. Unless this is arrested and reversed, then clearly it will severely limit the ability of adults to enter into higher education of any form.
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	Strongly agree
What might examples of non-financial support be?	There needs to be a massive and high-profile communications campaign to raise awareness among learners and employers about the quality of higher technical qualifications, and the benefits of pursuing this route. This includes 'return on investment' messages that demonstrate the salary expectations and career opportunities in highly-skilled technical fields, as well as routes to progression beyond Level 4 & 5.
	Providers will need training and support to enable staff to deliver HTQs. This includes capacity to release staff for training in new qualifications, refreshing their industry knowledge and experience, and increased engagement with employers. Ongoing support and CPD opportunities will also be important – for example, webinars such as those that QAA offers to its members.

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.**	a) Resources need to be linked to supply and demand in the market. The market is currently led by student demand and the subsequent fee income, rather than being driven by employer demand and job opportunities after completion. Any re-allocation of existing resources will inevitably impact on existing areas of provision – what is needed is a further allocation of resources, not a re-allocation of existing ones. b) Appropriate capital funding will be required to ensure learners have access to industry-standard environments. This will be a recurrent cost because equipment will need to be upgraded and/or replaced frequently to remain "industry-standard and up to date". Providers will also need support to enable staff to keep in touch with the latest industry practices so their knowledge and experience is up to date. c) We would endorse the view put forward by the Independent Review of Post-18 Education and Funding that what is needed is a more equitable distribution of funds both within the higher education sector and across FE and HE. This should include a fully-funded and resourced HTQ offer.

Section 3: Student and employer demand	
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	Strongly agree
Please provide examples from your experience:	We have extensive experience in this sphere and are seeing strong demand for technical qualifications at Level 4, 5 and 6, both from learners and from employers. This demand ranges from creative media (e.g. Foundation Degrees in The Manchester Film School and Media Make-up Artistry) to business, professional and financial services (e.g. AAT accountancy qualifications) and healthcare (e.g. counselling). We have provided some case studies in response to earlier questions and add two more at the end of this section. However, nationally the trend has been away from higher technical qualifications, despite overwhelming evidence that learners who complete high-quality HTQs are more employable and can expect higher average wages than many of their peers who complete three-year academic degrees. Tackling these social norms – and offering options for people to top them up to a degree-level qualification at a later stage – is essential to avoid further skewing of demand away from the Level 4 & 5 skills that employers actually need. The Greater Manchester Local Industrial Strategy recognises that much of the city region's forecast growth depends on people with higher technical skills (e.g. digital, advanced manufacturing, decarbonisation and so on). High-quality HTE is therefore absolutely essential to GM's future economy, especially as there is already shortage of staff with technical skills at Level 4+. GM Chamber's latest quarterly economic survey (Q2 2019) found employers reporting increased difficulty in filling vacancies, with skilled roles proving the hardest to fill (along with professional/managerial).

	Student case studies: New opportunities for highly-skilled work in Manchester's burgeoning creative industry
	Creative media has been identified as a key 'frontier' growth sector in the Greater Manchester Local Industrial Strategy agreed with central Government. We're working with employers, business leaders, the LEP, and GMCA to meet the demand for highly-skilled employees. In doing so, we're also helping local people on low or no incomes to transform their lives with skills for new careers in TV and film.
	Dominique* was a 19-year-old single mum with few qualifications when she began her foundation degree at The Manchester Film School (part of LTE Group t/a UCEN Manchester). Along with technical training, we provided advice and support throughout her studies and she now works as a camera operator with a CV including Shameless, No Offence and George Gently.
	Sophie* had a passion for TV and film but no relevant qualifications or experience when she started her course. During her time at The Manchester Film School, she built her confidence and her portfolio through work placements and now works as a camera assistant. Her CV includes Poldark, Sherlock, This Is England 90 and The Durrells.
	Names have been changed
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	Strongly agree

Please provide any additional ideas.	We welcome the decision that all Level 4+ qualifications will now be included in measures of "progression to HE". Higher education means Level 4+ so it made no sense that higher technical qualifications were not previously included. Similar changes should be made to OfS attainment data so that they recognise learners' success in HTQs. The current OfS performance measures only include First Class and 2:1 degrees. There is no recognition of learners who achieve Distinctions in HTQs such as foundation degrees, HNDs and HNCs. This does little to promote Level 4 & 5 technical qualifications as valid alternatives to academic routes. Parity in the student finance package is also key. Offering a more competitive student finance package for approved HTQs would signal 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.
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	Strongly agree

In what other ways could we help fill the HTE information gap for: Young people & their teachers	IAG about HTQs needs to start much earlier in schools than is currently the case for there to be any chance of combatting social norms about the supposed 'superiority' of academic routes. Parents/carers are also key influencers when it comes to young people's education/career choices so it is important to inform them about higher technical routes.
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	-
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.**	**SEND support** One of the biggest barriers is the fact that Education Health & Care plans stop at Level 3: there is no equivalent at Levels 4 & 5. 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 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. Learners without a formal diagnosis are unable to access any form of support at all. (Again, this is different from Level 3 where support is available via ESFA funding.) At Level 4+, there is no route by which these learners can be assessed and seek a formal diagnosis unless they self-fund an assessment, which usually costs £250-£650. This is far beyond the reach of the majority of our learners, many of whom come from the most deprived wards in England. This is a real issue as people who cannot afford the diagnosis needed to access support beyond Level 3 find themselves unable to continue their studies.

We would like to see DSA being brought into line with the new SEND code of practice and EHC plans so there is a smooth transition rather than a cliff-edge in support as learners progress from Level 3 to 4, 5 and beyond.

Other barriers for SEND learners in higher technical education can include:

- DSA doesn't fund assistance to help learners with mobility issues to get around their college or university.
- Level 4 & 5 courses often have the bulk of assessment at the end of the course, which can be difficult for some learners with specific learning difficulties.

Contextual admissions and learner support

We operate a contextual admissions system very successfully, with inclusive tariff points and recognition of prior learning and prior experiential learning. For example, potential learners aged 25+ can demonstrate prior experiential learning gained through work. We map their experience against the course requirements and make a careful assessment based on course content and contextual factors.

This allows us to admit learners from non-traditional backgrounds but who we are confident will be able to meet the course requirements. We have countless examples of learners who have come to us without traditional entry qualifications but who have been extremely successful HTQ achievers. HTQs offer opportunities to learners who may have learnt a trade hands-on but find it hard to progress their career without formal qualifications, as well as those who might have stopped studying at Level 2 or 3 and now want a higher-level qualification so they can access better jobs. They can complete a HTQ in Construction & the Built Environment, Healthcare Practice, Creative Media Production, Computer Network Security and many more highly-valued and much-needed higher technical fields. (See Joe*'s case study earlier in our response.)

Many of our learners face extensive challenges: for example, care leavers, migrants, young people who may have been on at-risk registers, poor mental health, SEND, insecure accommodation and/or difficult socioeconomic circumstances.

We assess every learner's needs and provide wraparound support – coordinated via a personal tutor and supplemented by specialist teams – to enable them to complete

their studies successfully. This could be initial academic support for learners who may not have been in education for a while but who have strong technical knowledge gained through work. Equally, it could be regular pastoral support, housing and benefits advice, counselling, mentorship, reasonable adjustments to enable a SEND student to achieve Level 4 & 5 skills, and so on.

Minimum contact hours can also be important for many disadvantaged learners who may be less confident when it comes to self-directed learning.

Accessibility and delivery mode

The majority of our Level 4 & 5 learners are already in some form of paid work although it may not be in their chosen field. For HTQs to be truly accessible to those who will benefit from them most, they need to be available via flexible learning. This includes:

- Part-time / modular options so people can flex studies around other commitments such as work and caregiving responsibilities.
- Options for delivery outside traditional settings e.g. the ability to offer blended learning with online content that can be accessed at the learner's convenience. (Note: This will suit some learners but cannot be the only route or it will be a barrier for the many people who don't have digital access.)
- Travel time and travel costs can also be barriers for disadvantaged learners, and this applies to work placements as well as their usual place of learning. While bursaries can help towards travel costs, it may be difficult for some learners to make journeys from home to their child's school/nursery to their place or learning (or work placement) in time.
- Digital access is another potential barrier. While digital options will increase access for some learners, especially those in work, there needs to be support in place for those who don't have regular access to laptops or wifi outside their usual place of learning.

Staff training and communication

The new HTQs are likely to require the recruitment of more technical staff who may not have the same awareness of how to support vulnerable, disabled or disadvantaged learners as regular teaching staff. Providers will need to be able to

	equip new staff with this awareness, including how to format resources and make .learning materials and assessments more accessible. Using plain English and dyslexia-friendly techniques also increases accessibility for other learners (e.g. machine-reading for learners with visual impairments). New staff will also need to learn how to give learners feedback on the quality of their work in a constructive way. While learners need to get honest feedback that reflects a workplace environment, there also needs to be a strong pastoral element.
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.**	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.
Do you have any other comments? **Please provide comments.**	We very much welcome the increased focus on higher technical qualifications and fully support what the consultation aims to achieve. Higher technical qualifications equip learners with skills that are vital to the UK economy, as well as improving their own career and life prospects. It's important to recognise that entrants to HTQ courses are roughly 50/50 split between young learners progressing from school or college and adult learners, many of whom are combining their studies with work and/or caregiving responsibilities. The new HTQ qualifications need to work for both groups when it comes to curriculum, funding and accessibility. We also have some concerns, however, about the potential for unintended consequences if there is insufficient funding for HTQs or if funding is removed or decreased for qualifications that, for a variety of reasons, may not meet the criteria for HTQ kitemarking. This includes 'stepping stone' qualifications that act as a bridge into Level 4 & 5 qualifications, as well as highly-valued HTQs in curriculum areas that are not currently covered by IfATE's occupational maps and route panels.

| | Cutting or removing funding for these qualifications would be highly counterproductive to the consultation document's stated ambition of increasing the prestige, accessibility and take-up of HTQs.

We note that House of Commons Library Briefing Paper 7951 (August 2019) highlights that, in 2017, the Government consultation on T-levels promised that bridges into higher technical and academic routes would be considered as part of the Level 4 & 5 consultation. We are disappointed that this consultation implies that existing bridges may see their funding reduced or removed. |
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