

# IOP Institute of Physics

## Institute of Physics submission to the Department for Education consultation on Higher Technical Education

23 September 2019

Question	IOP response
<p>To what extent do you agree or disagree with the proposed aims of HTQs set out in paragraph 9 above?</p>	<p>We broadly agree with these proposed aims.</p> <p>In order to help achieve a well-balanced education and skills system, and to fulfil the ambitions of the 2016 “Post-16 Skills Plan”, it is important that HTQs are seen as credible qualifications in an alternative route, by employers, students and society as a whole.</p> <p>Qualifications must be valued by students, so that they will take them, and by employers, so that students will be able to access secure, skilled employment that is relevant to the qualification.</p> <p>While it is important that employer demand plays a central role here, ensuring high-quality education and learning for its own sake is also a positive concept and should be included as an aim.</p> <p>In addition, we would add a further aim to this list that HTQs should help align the supply and demand for work-related skills, both now and in the long-term future. People taking HTQs should be equipping themselves with a skillset that will last a lifetime, adapting to changes in economics and technology.</p> <p>The IOP’s own qualitative research on education and skills policy, demonstrates that there is a deficit of Level 4 and 5 qualifications. Indeed, according to this evidence paper: only 187,000 people were studying for a Level 4/5 qualification in 2016/17 compared to 2 million across both Level 3 (A level equivalent) and Level 6 (degree equivalent).</p> <p>This shortage is a fundamental aspect of the evidence base and addressing it should be reflected here as one of the main aims of HTQs.</p>
<p>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?</p>	<p>We support the principle of assessing qualifications for approval against occupational standards.</p> <p>The Institute for Apprenticeships and Technical Education (IfATE) is potentially a suitable body for this. However, the Government must ensure it has both the resources and capacity to take on this significant increase in its workload and remit.</p> <p>We note that several of IfATE’s existing occupational standards for apprenticeships are light on detail, especially those related to science.</p> <p>By contrast, the IfATE’s standards for T level programmes are much more detailed and specify the precise areas of knowledge and skills that the course will involve. While T levels are only Level 3 qualifications, we do not see why a</p>

	<p>similar approach cannot be taken for HTE at Levels 4 and 5.</p> <p>As such, we believe that the standards for HTE should be more in line with the IfATE’s detailed approach for T levels rather than the types of standard for apprenticeships.</p> <p>HTE, and other forms of technical Further Education, are distinct to apprenticeships in that they are more pedagogical and not purely driven by employer interest, and this must be reflected in policy and regulation.</p> <p>We would recommend that Government makes assessment and approval compulsory. A voluntary route will not achieve the comprehensive uplift in course quality, and socio-cultural approval, that the situation, as outlined in the Chase for Change, demands.</p>
<p>What is your view on our proposal that, upon approval of a higher technical qualification, there should generally be no transfer of copyright?</p> <p>What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?</p>	<p>The IOP does not have a view on this.</p>
<p>As Awarding Organisations and Higher Education providers, how important are the following as incentives to encourage the submission of your qualifications for Institute approval?</p> <p>a. A clear mark of labour market relevance</p> <p>b. A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)</p> <p>c. Enhanced support for potential students through information, advice and guidance (e.g. careers</p>	<p>We do broadly agree that the following incentives would help increase levels of voluntary submission for IfATE approval.</p> <p>a. A “clear mark of labour market relevance” could enhance the attractiveness of an HTQ for prospective students, but more clarity is needed on what form the “mark” would take and how it would be communicated. The “mark” would need to be backed by an effective PR and engagement campaign to ensure it had credibility. We also feel that regional divergences in employment and the labour market should be accounted for here when communicating the employability of different HTQs.</p> <p>b. Funding is crucial to determining the success of many educational programmes. This is the most important incentive on this list. The lack of an extensive student finance support system for FE was identified in the Augar Review as a barrier to increasing access to technical education among the population.</p> <p>c. Enhanced Information, Advice and Guidance (IAG) support for students would be beneficial but again more detail is required on what would constitute “enhanced” IAG.</p> <p>d. A swift and decisive decision making process would be welcome in</p>

<p>advice)</p> <p>d. A swift and straightforward process for submission, appraisal and decision-making</p> <p>e. Other (please specify)</p>	<p>helping reduce regulatory complexity in the sector.</p> <p>e. We maintain that submission should not be voluntary. HTE can only benefit from proper regulatory approval and as such, this should be compulsory.</p> <p>We also stress that there should be no additional costs for individuals as a result of any of these changes.</p>
<p>Would you support incorporating the above flexibilities/requirements in the Institute approval process, and are there any specific points you would like to raise in relation to the above?</p>	<p>The IOP believes that flexibility is very important when it comes to technical education. HTQs will relate to a highly diverse set of individuals and employers and the qualifications must be adaptive to their needs in order to ensure that they are truly open and accessible to all sections of society.</p> <p>As outlined in the accompanying equality impact document, around 12% of Level 4 and 5 students are disabled and may need flexibility in terms of hours and access in order to help manage their learning alongside their disability. For example, alternative means of capturing lectures and other learning materials is something the IOP recommends for supporting disabled students at university physics departments.</p> <p>Moreover, with an average age of 30, FE students are more likely have caring responsibilities than HE students who are predominantly younger. Further, the principle of providing additional skills in maths and English is to be encouraged. Around 40% of 25 year olds have a Level 2 or lower as their highest qualification. These core skills are essential to cultivating a lifelong, adaptable skillset.</p> <p>This lack of basic skills can hamper their progression onto HTE courses. Provision to help close this gap would boost accessibility and uptake.</p> <p>However, whether or not this could be provided as an additional short course, rather than tacked on to a main HTQ, should be considered.</p> <p>We would also support flexibilities in terms of specialised business and skills needs, where appropriate.</p>
<p>Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements?</p>	<p>The IOP is not strictly opposed to the existing system of regulation.</p> <p>Nonetheless, preserving a complicated status quo without exploring other options that could potentially reduce the regulatory burden in the sector would be a missed opportunity.</p>
<p>Are the suggested criteria suitable markers of high-quality technical provision?</p>	<p>We support these suggested criteria.</p> <p>However, we also believe that providers need the right support from the Government in order to meet these new standards.</p> <p>Bringing in the right equipment can be expensive, given the specialised nature of HTE. As such, enhanced funding commitments for further education would be welcome.</p> <p>As identified by the Augar Review, staffing and personnel represents a major</p>

	<p>challenge for the FE sector. There is currently a significant deficiency in both recruitment and retention of teaching personnel across the education system.</p> <p>The Government and the FE sector will need a stronger understanding of the types of individuals they would like to recruit and where they will be recruited from. Once in post, issues such as retention and Continuous Professional Development (CPD) also need to be addressed to make sure new recruits stay in the sector for the long run.</p> <p>In addition, it would be helpful to add an additional criterion encouraging partnerships between the owners of the qualifications and the providers: ensuring smooth implementation and quality assurance.</p>
<p>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?</p>	<p>We agree that it is right that providers are required to meet certain conditions in order to qualify for registration.</p> <p>However, providers need resources and support from the Government in order to meet these conditions.</p>
<p>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?</p> <p>a. How might this work to ensure provision best meets local skills needs?</p> <p>b. What specifically would additional funding support?</p> <p>c. Would additional costs be a barrier to delivering high-quality HTQs? Why?</p> <p>d. Which would be a greater priority for providers: 'capital' or 'recurrent grant' funding? Why?</p>	<p>Incentivising higher quality provision via the inclusion of dedicated funding is a useful tool. This is because FE providers are, in most cases, run as businesses.</p> <p>a. It is vital that provision best corresponds to local skills needs. This can be ensured by including a diverse cross-section of local employers in provider-stakeholder engagement and by mapping present and future skills needs.</p> <p>b. This funding could be used to help support the teaching of more expensive, technical courses to smaller cohorts of students, something that would otherwise not be in the economic interests of providers.</p> <p>c. Additional costs would always represent a barrier to delivering high quality technical education. In particular, additional costs related to technical equipment and laboratory space and those relating to staffing costs and training, could be especially challenging to delivering effective science-related HTE.</p> <p>Indeed, a 2017 DfE review of FE policy conceded that: "It is commonly accepted that science, technology, engineering, and maths (STEM) subjects carry greater financial risks compared to other subjects, partly because of the required investment in technical equipment and premises."</p> <p>d. We believe that both capital and recurrent grant funding are equally important for HTE. However, in the initial stages of these reforms, it makes sense to focus more on capital spending in order to lay the foundations for further growth in the future.</p>
<p>To what extent do you</p>	<p>We broadly agree with this proposal. Linking more competitive student finance</p>

<p>agree or disagree that we should explore how providers that meet the ongoing registration conditions specific to Higher Technical Education could have access to a more competitive student finance package for courses leading to approved HTQs than those who do not meet the technical conditions? Why?</p>	<p>packages to courses that demonstrate higher quality (via meeting the conditions) would help incentivise students to pursue higher quality courses.</p> <p>At the same time, this may be disadvantageous for certain providers, such as those that are newer, or face particular funding or staffing challenges. As such, it may be reasonable for the Government to explore a clemency period so as to avoid entrenching inequality in the system.</p>
<p>To what extent do you agree or disagree that additional non-financial support will be needed to enable providers to develop their workforce and engage fully with employers? What might examples of non-financial support be?</p>	<p>We agree that all forms of support (financial and non-financial) will be necessary to support providers.</p> <p>We have heard anecdotally from members and stakeholders that there are considerable regional divergences in employer engagement, particularly outside of Greater London and South-East England. Providing support to connect providers with employers in these areas would be worth exploring. Equally, based on recent stakeholder engagement events hosted by the IOP, there is a sense that employers and providers want more clarity and assistance in connecting with each other. Some form of centralised portal for facilitating provider-employer engagement could be beneficial in this regard.</p> <p>A learning from lower-level skills and technical education is that providers need support to address gaps in social work and safeguarding. For instance, Barnardo's ETS (Employment, Training and Skills) programmes include considerable proportions of the population that have higher than average mental health issues.</p> <p>By providing effective safeguarding and mental health support in the programme, the relevant stakeholders were able to provide effective training to both affected individuals and the wider cohort.</p>
<p>We welcome ideas from respondents on:</p> <p>a. How providers could best allocate their existing resources to build and support capacity and delivery of approved HTQs;</p> <p>b. Where additional help may be needed; and</p> <p>c. What providers think</p>	<p>We have no further comments to add.</p>

<p>should be prioritised in terms of any future funding allocation.</p> <p>If you have any further comments that are not covered in the above, please include here.</p>	
<p>To what extent do you agree that there is a need and opportunity for more young people and adults (including those who need to upskill/retrain) to be undertaking HTE in the future?</p> <p>Please provide examples from your own experience.</p>	<p>The IOP concurs with this view. It is well-documented that there has been a significant drop off in recent decades in those undertaking Level 4 and 5 technical education. This has been termed the “missing middle” by the Gatsby Foundation and has particular implications for the science sector.</p> <p>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.</p> <p>Equally, mature students are not making up the shortfall and their numbers actually fell by 20% from 2011 to 2017, according to Million+.</p> <p>This all contributes to a significant STEM skills gap with 89% of STEM employers reporting a difficulty in recruiting people with the right skills in a 2018 survey by STEM Learning.</p>
<p>To what extent do you agree with these measures to improve the profile of HTE?</p>	<p>We agree with the measures outlined. As a set of broad principles they are a positive development.</p> <p>We would like to see more detail on specifically how awareness will be raised and how the shift in cultures and attitudes will be delivered.</p> <p>In particular, we would stress that improving data collection is key to raising awareness, as it will allow enhanced targeting of marketing and engagement.</p>
<p>To what extent do you agree with these measures to improve IAG for young people, adults and employers?</p> <p>Please give further thoughts on other ways we could help fill the HTE information gap for:</p> <ul style="list-style-type: none"> <li>• Young people and their teachers considering their options after completing a level 3</li> </ul>	<p>These are broadly admirable as principles and commitments.</p> <p>Significant support will be needed for schools and colleges in building an understanding of HTQs. If these are to be viable learning pathways then teachers, lectures and careers advisors will need to have a comprehensive understanding of the provision and the options on offer.</p> <p>Support will also be needed to help develop a wider societal understanding of and appreciation for these qualifications.</p> <p>More details are needed with regards to how uptake and interest will be raised among under-represented groups and adult learners, many of whom have their own specific access needs.</p>

<ul style="list-style-type: none"> <li>• Adults in the workplace who need to upskill/retrain</li> <li>• Employers who have skills shortages at higher technical level</li> </ul>	
<p>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?</p>	<p>We would like to see more clarity on whether these qualifications are driven by the needs of employers or potential students. The nature of provision will differ depending on which group is targeted.</p> <p>At several points in this consultation, the Department has indicated that although many recommendations of the Augar review are relevant to these provisions, it will not comment on whether or not these recommendations will be implemented.</p> <p>We would urge the Government to strongly consider implementing the Augar review’s recommendations for Further Education, particularly around increased funding and regulatory equalisation with Higher Education. This is an ideal way to deliver the improved HTE offer that this consultation is based on.</p> <p>At the same time, the Government should also guarantee that any reforms to Further and Higher Education do not result in a real-terms funding decrease for universities. One sector should not lose out to the other.</p>
<p>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.</p>	<p>Our evidence base across the whole education system demonstrates that there remain considerable gendered stereotypes that drive subject choices and career pathways. The course of an individual’s education is therefore being significantly influenced by gender stereotypes. Instead, through early intervention and a systemic approach we can help remove barriers to unrestricted student choice.</p> <p>Moreover, in the consultation document itself, it is notable that there are only partial references made to improving access to HTE from underprivileged groups.</p> <p>It may be pertinent for the Government to explore how it can boost participation from protected characteristic groups in greater detail. As part of this we would like to see the Government Equalities Office be given an enhanced role and remit with regard to skills. Specifically, the GEO should be able to cover apprenticeships and technical education, mapping data of those who access these programmes and their personal characteristics.</p> <p>Such improved data collection could in turn feed into the awareness raising and marketing campaigns referred to in the consultation document. Being able to specifically target certain audiences would also improve the outreach to otherwise underrepresented sections of society.</p>