



Department  
for Business  
Innovation & Skills

**A DUAL MANDATE FOR ADULT  
VOCATIONAL EDUCATION  
CONSULTATION**

**Response Form**

MARCH 2015

# A dual mandate for adult vocational education consultation - response form

A copy of the consultation document can be found at:

<https://www.gov.uk/government/consultations/adult-vocational-education-challenges-over-the-next-decade>

A further version of the response form is also available to complete on line at:

<https://bisgovuk.citizenspace.com/fe/a-dual-mandate-for-adult-vocational-education>

You can email or post this completed response form to:

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If you are emailing the document, please include "dual mandate" in the subject box.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is: 16 June 2015

## Your details

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Please tick the box below that best describes you as a respondent to this consultation

- Representative organisation
- Independent Training Provider
- College
- Awarding Organisation
- Charity or social enterprise
- Individual
- Legal representative
- Local government
- Local Enterprise Partnership
- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Small business (10 to 49 staff)
- Micro business (up to 9 staff)
- Professional body
- Trade union or staff association
- Industrial Strategy sector
- Other (please describe)

## **National Colleges**

**Question 1: How can the National College proposals be developed to ensure the employers across the whole sector benefit?**

**Question 2: How can National Colleges best work in partnership with local FE colleges, private training organisations and HEIs?**

It will be really important to ensure that National Colleges do not duplicate provision in a local area. They will be most effective where they work with other providers with the support of their local enterprise partnership (LEP) or local authority/ devolved authority. They must also only be created where there is sufficient local demand. The Government must learn from errors made in the creation of UTCs, where there has not been take up by learners in the local area.

**Question 3: Which priority sectors should be targeted for future National Colleges?**

## **Communications and branding**

**Question 4a: Would you support rebranding English higher vocational education as either "Professional Education and Training" or "Professional and Technical Education"?**

Yes

No

Don't know

**Question 4b: If so, which would you prefer and why?**

Professional Education and Training

Professional and Technical Education

**Please explain your response:**

We believe that the sector should spend its time and energy supporting providers to deliver high quality education rather than deliberating over a name change. A simple name change alone is unlikely to attract learners, instantly improve the sector's reputation or overcome the financial challenges which the sector is facing. A name change feels like an attempt at a quick solution to a more complex problem.

**Question 5: Would you support a national advertising and marketing campaign for higher vocational education?**

Yes

No

Don't know

**Please explain your response:**

In light of the severe cuts to adult FE it is crucial that any campaign is well targeted and has clear messaging. Providers are unlikely to be supportive of an expensive campaign which does not have clear objectives or produce results for the sector. A campaign of this sort must be accompanied by better universally delivered, formal and informal, careers education, information, advice and guidance if it is to be effective.

**Question 6: What other means of promoting higher vocational education do you think would be desirable?**

NUS would advocate investment in careers education, information, advice and guidance.

We believe that supporting the development and promotion of vocational learning is integral to the future of education and skills, and that this should be developed so as to be well integrated into the rest of our tertiary education system.

There is concern that teachers, as one of the main points of contact for IAG, can often be influenced by their own personal biases. This means that they may often direct students down the traditional path of study (GCSE, A-Level, University), as opposed to the more vocational route. There is also a lack of incentive, and even a disincentive, for schools to deliver IAG which might direct some students away from the traditional academic route.

In 2013 NUS carried out a survey of apprentices, exploring the role of careers guidance in informing people about their available opportunities which showed that:

- Twenty one per cent of apprentices had never received any information about apprenticeships from a careers service in a school, college or university.
- Forty six per cent of students who did receive IAG rated it as either barely acceptable or very poor.
- Many students who did receive IAG felt that they had been guided away from apprenticeships towards other education and training.

Where the focus of careers guidance is on the 'A-Level to University' pathway there are gaps in information and support regarding apprenticeships, meaning that many miss out on the opportunity.

The government needs to fund an independent statutory careers IAG system that is integrated across schools, colleges, training providers, and universities. We need a careers service which helps individuals develop the skills they need to succeed as well as addressing the needs of the labour market. This must be in tune with local, national and global careers opportunities, delivered in part by developing meaningful relationships with employers and local providers.

**Question 7: How can we encourage more individuals to study higher vocational education?**

NUS recently conducted a focus group with students at Warwickshire College on the topic of higher vocational education (HVE). The group decided that the two most important factors when considering HVE would be cost and reputation. This being the cost of the course compared to university and the reputation of the provider and the impact of that on future employment.

A lower cost course was very attractive to learners and especially apprenticeships where you can earn money as well as gain qualifications. Despite this it was also very important that the provider had a good reputation. The learners were acutely aware of the prestige attached to a university education and concerned that their qualifications would not be viewed as favourably by employers. Future employment prospects were therefore also very important and those courses which had links to local and national employers were seen as valuable.

### **Part-time higher education provision**

#### **Question 8: How can we encourage more individuals to study part-time Higher Education?**

The problem of declining numbers in part-time higher education is not only a demand-side problem, and we believe that it is hugely important for government to understand this point.

On the supply-side, the current competitive market-based model of higher education is creating disincentives for HEIs to offer innovative and flexible part-time provision. HEPI analysis of the impact of HE reforms on demand has also shown that the decline in part-time students is, at least in part, related to supply side changes, such as the closure of part-time courses (HEPI, 2013). These cuts are related the pressure on institutions to make short-term market-driven decisions of HEIs in response to unhealthy and asymmetrical market competition.

Between 2011-12 and 2012-13, there was a 50% decline in part-time enrolments at Russell Group universities. We're seeing a growing trend in which high-tariff institutions are cutting courses because they are not deemed to fit in with the institution's prestigious reputation (NUS 2013, 2014). The widening participation agenda is being seriously damaged by the marketing decisions of universities and runs counter the government's drive to improve access to higher education.

Sir Eric Thomas, who led Universities UK's review into part-time study said, at a conference last year on part-time study, that "it was a public duty... that all universities should provide part-time study". But at the same conference last year, institutions raised concerns about the higher risks and lower margins associated with part-time and more flexible provision. These are reasonable concerns, and they must be remedied through sector collaboration and a shift in government policy.

Therefore, in order to encourage more individuals to study part-time, we must begin by tackling the decline in part-time provision, and remove the market disincentives that push institutions to focus on full-time undergraduate provision. This will involve redressing the imbalance in cost of provision of part-time relative to full-time. HEFCE suggest that part-time students are 15-44% more costly to recruit, retain and support compared to full-time students (HEFCE 2013). The introduction of up to £9,000 undergraduate fees in particular has meant that institutions find it easier and more financially lucrative to focus on full-time undergraduate provision.

One possibility would be to reintroduce a part-time funding premium as part of the teaching grant. Another option would be to provide start-up funding for new part-time, flexible provision to help institutions overcome the financial burden of starting a new course.

Giving more powers to OFFA to intervene on the basis of expanding diverse pathways, particularly mature and vocational entry routes, in partnership with other providers into higher education, not just 'fair access', could also have a positive impact. This could, in particular, ensure that there remains access to part-time study in our most selective institutions.

On the demand side, it is much clearer now that the post-2012 fees regime has put many people off of studying part-time. Part-time students tend to be older and will be carefully weighing up the costs and benefits of study. A combination of higher cost of study, wage stagnation, increased cost of living (particularly for those on low incomes), lack of employer support and general economic uncertainty have led to a fall in demand. In the long run, economic growth could stimulate demand for part-time study, but this requires the growth to have a positive impact on low wage jobs and job security without further increasing the cost of living. The current economic model does not appear to be providing this form of growth. Thus, it will be necessary instead to look at improving the financial support available to part-time students.

The part-time loans scheme has had low take-up for a number of reasons, but in particular, the eligibility criteria have played a key part in its failure to stimulate the take-up of part-time study. Having a ban on funding for returners to study with an equivalent level qualification has been problematic for matching the needs of individuals in a changing labour market to the required skills needed to succeed. The relaxation of the ELQs policy has helped a few people gain access to support, but part-time loans should be made available for all part-time ELQ students, at least after a reasonable number of years between qualifications.

If students are not eligible for a loan, they must pay for their part-time fees up-front, rather than having the opportunity of deferring payment. This in itself is a clear barrier for entry.

There is also no access to maintenance loans for part-time students, which limits the possibility for many adult learners to take up part-time study as they cannot afford the cut in family income moving from full-time to part-time employment. Many other European countries offer adult learners support grants and loans as an income supplement for part-time study as their governments understand the economic benefits of supporting upskilling and reskilling in the labour market and know that supporting part-time education for career development will pay for itself through increased tax revenues.

There are a number of other anomalies within the student finance system which disadvantage part-time students, thus acting as disincentives to study part-time. For instance, despite part-time student being more likely to have caring responsibilities, they have no statutory entitlement to childcare support during study, whilst full-time students can apply for a childcare grant. Government should work to amend these anomalies and ensure that taking up part-time study does not penalise particular more vulnerable groups such as student parents and disabled students.

Improvements to the information, advice and guidance provided by institutions can also help. IAG needs to be geared to the needs of groups likely to take up part-time and more flexible course options. We know that mature and part-time students in particular are likely to get the bulk of their course information directly from institutions, and tend not to shop around for courses. So the information provided must be accurate and tailored to their needs. Information about course flexibility, geographical proximity, childcare costs,

whether the campus is child-friendly, local transport, and additional course costs should be made easily available.

**A new overarching body to manage awarding powers for higher level vocational qualifications**

**Question 9: Should a new overarching vocationally focused body be established to grant higher vocational awarding powers?**

Yes

No

Don't know

**Please explain your response:**

We would support the introduction of a technical accreditation council, as proposed in AOC's Breaking the Mould report. This would reduce bureaucracy and save providers time and money. We support the notion that this would also empower colleges to award their own qualifications and design courses which are responsive to local need.

**Question 10: How could we increase the role of employers in scrutinising applications for new awarding powers?**

NUS would urge an increased role for employers to be matched with greater student accountability and a place for NUS to monitor quality for learners.

**Question 11a: How can the role of National Colleges in defining qualifications, apprenticeships standards and assessments and curricula best be taken forward?**

**Question 11b: Should other, high performing providers be empowered to do this?**

Yes

No

Don't know

**Please explain your response:**

**Question 12: Are the right awarding powers in place to facilitate an increase in the uptake of HNC, HND and BTEC type qualifications?**

Yes

No

Don't know

**Please explain your response:**

**Question 13: How do we design delivery and assessment in a way which imparts work ethics, occupational attitudes and standards, while enabling learners to reflect on and improve these?**

It would be interesting to see the evidence which indicates that this isn't already happening and which shows that learners are coming out of education without the appropriate work ethics and standards.

If this is the case then we would encourage genuine, and good quality work experience placements. In addition we would also encourage providers to offer opportunities to deliver occupational attitudes and a wider understanding of organisational governance (i.e. engage students in decision making and the structures in within providers).

Delivery and assessment must be reflective of the broad world of work, not just reflective of the expectations of corporate business. Learners should be taught that personal identity, shared values, independence, a critical approach, dissent and debate and innovation are all skills and attributes recognised by some employers, and that finding an organisation/sector that you feel an affinity with can be just as valuable to the employer as qualifications and general workplace skills.

**Question 14: How do we develop these mechanisms without losing existing quality products that already meet these standards and which employers recognise and have faith in?**

**Refocusing the Foundation Degree curriculum**

**Question 15: Should the Government be prescriptive about the role of employers in the design, development and delivery of Foundation Degrees?**

Yes

No

Don't know

**Please explain your response:**

The Government must ensure a clear standard of quality and transferability of qualifications, rather than give free reign for employers to design and deliver courses set definitively for the way things work in their organisation.

**Reviewing Foundation Degrees Awarding Powers (FDAPs)**

**Question 16: Should we consider some form of specialised FDAPs rather than general powers to award any kind of foundation degree?**

Yes

No

Don't know

**Please explain your response:**

**Question 17: Could the FDAPs process and/or criteria be changed to improve access while maintaining quality?**

Yes

No

Don't know

**Please explain your response:**

**Question 18: How do we ensure that the quality assurance arrangements are appropriate to foster the right type of HVE (higher vocational education)?**

### **Work-based learning and higher vocational education**

**Question 19: Should all HVE courses involve work based learning?**

Yes

No

Don't know

**Please explain your response:**

Direct links to employers is really important for learners and a course which offers this is much more likely to be popular and successful. Learning in a work based environment gives people direct experience and equips them with the skills which they will need on completion of their qualification.

However there should be key outcomes in place for learners on placement, with space for reflection and support on the placement and within the provider. This will ensure that work experience is meaningful and not free labour to a company.

### **Specialisation in colleges**

**Question 20: Are there other lessons to learn from the implementation of the CoVE (Centres of Vocational Excellence) programme?**

Yes

No

Don't know

**Please explain your response:**

**Question 21: Should there be a new status for colleges specialising in higher level vocational skills as the Institute of Public Policy Research recommended?**

Yes

No

Don't know

**Please explain your response:**

**Question 22: How can we support FE colleges to achieve excellence in higher level vocational skills?**

Through investment in both the learner and the provider. We should explore what works across Europe and use the best models of practice from across European nations rather than trying to reinvent the wheel.

**HVE in the higher education setting – extending the role of universities and links with research and innovation**

**Question 23: What are the barriers to effective collaboration between colleges, universities and Catapult centres?**

**Question 24a: Should all Catapult centres be engaged in developing vocational education and higher level vocational skills training?**

Yes

No

Don't know

**Question 24b: If so, how best can this be achieved?**

**Question 25: What should the role of universities, colleges and Catapult centres be in growing technician level skills?**

**Question 26: How do we ensure even stronger employer/university engagement?**

By exploring university admissions processes and making sure admission teams are well aware of how vocational qualifications can be a route into their degree and masters programmes.

**Stronger virtual learning and use of technology**

**Question 27: How can Government drive the further adoption of new technology in FE institutions?**

We would urge the Government to look at Jisc's Digital Student project. The project undertook a comprehensive review based on 63 reports from the FE and Skills sector, conducted 12 focus groups with 220 learners across six general FE colleges, and contributed to six national consultation events and several other dissemination events.

It has produced a range of resources, trialled through the consultation events in order to support staff in FE to understand the experiences of all learners when using technology,

and to design services which meet their needs. The project resources can be used by colleges to gather experiences and expectations from their own learners.

### **Making the overall system more effective**

**Question 28: What is the best way to ensure greater local accountability on the part of providers towards learners and employers, in terms of relevance and quality of provision, and social and economic impacts?**

For colleges, accompanying guidance for governing bodies on the points set out in the English Colleges Code of Governance, delivered by the appropriate sector body.

**Question 29a: What benefits would there be to commissioning Adult Skills Budget provision through local partnerships or through a lead provider acting on behalf of a partnership?**

Benefits would be a localised understanding of the needs of an area and its economy. Within this providers are best placed as experts in both their local area and the delivery of learning within it.

**Question 29b: What downsides might there be to such an approach?**

It could be open to abuse if partnerships are not set out effectively. Freedoms from 2011 mean that different partnership models are set out, and LEPs all operate differently too. As a result provision could differ dramatically across geographical areas.

**Question 30: How do we ensure a stronger focus on outcomes without encouraging cherry picking of the easiest to help?**

**Question 31: What issues would there be with supporting programmes of study rather than qualifications?**

### **Testing alternative approaches**

**Question 32: What risks do we need to cater for in testing out new local arrangements to deliver skills provision for unemployed individuals and those with skills below level 2?**

**Question 33: What new approaches can be taken on commissioning and funding streams to maximise the value gained from public spending to support unemployed and disadvantaged learners?**

### **Community Learning**

**Question 34: If we were to make the changes described in paragraph 208 of the consultation document, how should we look to phase them in over time?**

**Question 35: Would a greater focus on commissioning partnerships enhance partnership working and deliver a more coherent Community Learning offer?**

**Question 36: What would be the pitfalls and unintended consequences that could arise from these potential reforms and how can we avoid them?**

**Question 37a: Do you agree that some institutions, such as Specialist Designated Institutions (SDIs), play a unique role within the wider sector and should continue to receive funding on an individual basis?**

Yes

No

Don't know

**Question 37b: Are there other organisations that should be considered alongside the SDIs?**

**Question 38: What would be the risks associated with these proposals?**

**Question 39: Would there be benefits from greater integration of Community Learning and Adult Skills Budget funded provision?**

### **Supporting the development of resilience in the sector**

**Question 40: What are the barriers preventing some colleges from adjusting their provision and approach?**

Colleges are currently operating under great funding uncertainty. They are facing re-organisation, staff redundancies and the possibility of even more funding cuts in this Parliament.

**Question 41: What lessons can we learn from colleges who have already made significant changes?**

**Question 42: How can relationships between localities and FE providers be strengthened?**

Through a more formalised approach to working with LEPs. By making LEPs more accountable and transparent, and embedded within the social community not just the business community of an area. Through this a more universal relationship can be built with the college, which isn't just based on bolstering a specific industry need.

**Question 43: What are the risks to colleges and providers with the shift towards greater local influence and control over skills funding and accountability?**

**Question 44: What are the advantages/disadvantages of Central Government taking an active intervention role in the FE landscape, including supporting new entrants and/or supporting mergers and rationalisation?**

**Advantages:**

**Disadvantages:**

**Thank you for taking the time to let us have your views on this consultation. We do not acknowledge receipt of individual responses unless you tick the box below.**

**Please acknowledge this reply**



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