

## FAB Proposals for the implementation of key recommendations in the Report of the Independent Panel on Technical Education and the Post-16 Skills Plan

In July 2016 the government issued the Post-16 Skills Plan, alongside the Report of the Independent Panel on Technical Education. The Skills Plan confirmed the government's 'unequivocal' acceptance of the 34 recommendations made by the Independent Panel. Some of the recommendations have the potential to impact significantly to the detriment of learners, providers and awarding organisations (AOs).

FAB's position in relation to the 34 recommendations is outlined below. This may be refined following consultation with FAB members.

Where the recommendations present significant risks to learners, FAB has also outlined a suggested route forward with implementation which we believe will manage these risks whilst still delivering the overall recommendation which has been accepted by the government.

Recommendation	FAB Response	Implementation
<p><b>Recommendation 1:</b> We recommend the Government develops a coherent technical education option which develops the technical knowledge and skills required to enter skilled employment, which leads from levels 2/3 to levels 4/5</p>	<p>The Federation welcomes the aspiration to further strengthen technical education which is critical to the future success of the economy and competitiveness in the global market. We support the intention to ensure that learners can progress into skilled employment from level 2/3 and continue their lifelong learning journey to achieve higher level qualifications at levels 4/5.</p> <p>However, we do not support some of the recommendations of the Independent Panel. In some cases, this is due to the lack of detail/information currently available on how the recommendation will be implemented. In other cases, this is due to our belief that the implementation of the recommendation would not be in the best interests of learners and</p>	<p>The Federation believes that the study programme approach could support the provision of a third option for learners who were not ready to choose a purely academic or technical route at age 16. Providers should be given the flexibility to respond to the needs of the individual learners, including where the learner wishes to pursue a 'mixed' approach to their learning at age 16-19. Learners could</p>

<p>and beyond, and which is highly valued because it works in the marketplace.</p>	<p>providers. We especially feel that the proposed interference in the competitive aspect of the technical qualifications market will be detrimental to providers, learners and technical education in the future.</p> <p>The Federation agrees that it is appropriate to offer learners a clear route into technical education at the age of 16 where a learner has made a clear decision that this is their preferred option. Similarly, where a learner has made a clear decision to pursue an academic path it is right and proper that this path should be available to them. We are, however, concerned that at age 16 some learners may not be ready to make that decision and we would welcome some exploration of the possibility of offering learners the additional choice of a third option; one which allow them to mix academic and technical education. We understand that bridging provision will be available for learners who decide to switch at a later stage between academic and technical education and it is important to offer this facility. However, this bridging provision may be required by fewer learners if they are provided with an option which allows them more time to choose between a purely academic or technical route.</p>	<p>be offered some academic learning leading to, for example 2 A-Levels PLUS some technical learning, for example a Technical Certificate or Applied General qualification. This type of ‘mixed’ approach would still allow access to HE or an apprenticeship once the individual learner had made a final decision on the route that suited them best. The Federation believes that the addition of this third option for learners will ensure that the education system is more learner focussed and more responsive to the needs of individual learners.</p>
<p><b>Recommendation 2:</b> The technical education option should be recognised as having two modes of learning: employment-based (typically an apprenticeship) and college-based.</p>	<p>The Federation believes that the two modes of learning outlined in the Independent Panel’s Report has the potential to be effective in providing learners with access to apprenticeships and other forms of technical education.</p>	<p>The Federation supports the two modes of learning in the technical route. However, as outlined above, we believe learner should have a third option available to them which provides a mix of academic and technical education.</p>
<p><b>Recommendation 3:</b> While it is necessary for</p>	<p>The Federation believes that it is important to have high quality standards at the heart of technical education which accurately reflect the skills and knowledge employers need to</p>	<p>The Federation believes that it is in the interests of learners to have access to</p>

<p>government to design the overall national system of technical education, employer-designed standards must be put at its heart to ensure it works in the marketplace. A single, common framework of standards should cover both apprenticeships and college-based provision. These standards must be designed to deliver the knowledge, skills and behaviours required to perform successfully in specific occupations, not the narrower job role-focused needs of individual employers.</p>	<p>support competitive activity, now and in the future. We fully support the need to engage employers in the development of the standards and agree that their views and opinions should be central to the definition of the standards. We also welcome the recognition by the panel that a narrow, job-role focussed approach to standards development is not a desirable way forward.</p> <p>The Federation believes that the process of developing National Occupational Standards has, in the past, provided standards which have generally reflected the views of a wide range of employers. We are concerned that the proposed 'employer panels' could result in the voice of a few large employers defining standards that meet <b>their needs</b> but not necessarily the needs of the wider sector. We are further concerned that these panels may deliver the narrow, job-role focussed standards that we have seen emerge from some of the recent Trailblazer groups and which have now been recommended by the Independent Panel for urgent review by the Institute for Apprenticeships (IfA). There appears to be a risk that we will dismantle an approach to NOS development in England and replace it with a system that may result in overly narrow standards that do not reflect the needs of employers across a whole sector.</p> <p>The Federation would like to see an ongoing commitment to supporting the development of high quality NOS in England (in line with the commitment of the devolved administrations). Commissioning of NOS development should allow bodies other than SSCs to tender for this work to ensure the most suitable organisation is selected for this work. For example, many of our members are professional bodies with close links to employers in their sector. These bodies are well placed to work with employers to develop the content of the standards. The IfA's professional panels could perhaps be</p>	<p>qualifications that map to UK standards.</p> <p>Our preferred option for the implementation of this recommendation is that the government considers how it can work with the devolved nations to support the provision of UK-wide occupational standards that support the transferability of qualifications achieved by learners across the whole of the UK.</p> <p>The work to develop the standard would be commissioned and carried out by an organisation that had both an understanding of how to develop and write standards and extensive links with employers in the sector. This could be a professional body, a sector awarding body or an SSC, for example. This would ensure the standards are based on the views of a wide range of employers. The Expert Panels could play an important role in this approach and could support the work, oversee and steer the development of the standards and authorise them for final use. This approach would make best use of the time available to panel members who will also be actively working in their sector and</p>
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	<p>used as a mechanism to 'sense check' the draft standards before they are finalised for use.</p>	<p>would therefore be likely to have wide range of issues requiring their time and focus.</p> <p>The expert panel could also have on-going 'ownership' for the standard, monitoring how well they reflect employer needs and signalling when they need to be updated to ensure they remain current and fully reflective of the needs of their sector.</p> <p>If this approach is not acceptable to the Government, then the Federation would like to see some action taken to ensure that the expert panels:</p> <ul style="list-style-type: none"><li>- Are fully representative of the whole sector they represent, including SMEs and sole traders.</li><li>- Consult widely with employers not fully engaged with the standard development process.</li><li>- Are trained thoroughly in how to write standards that are clear, aid consistent interpretation and not too narrowly focussed on a job role.</li></ul> <p>Writing clear, unambiguous</p>
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<p><b>Recommendation 4:</b> We recommend the Government incentivises the development of short, flexible bridging provision to enable individuals to move, in either direction, between the academic and technical education options and to</p>	<p>The Federation welcomes the recognition that learners may wish to move in either direction between the academic and technical options and that adults returning to study will need a clear pathway into whichever option they decide to pursue. There is, however, much work to be done to define and develop the content of such bridging provision to ensure it fully supports learners in changing options. Further clarity on the way forward with this recommendation would be welcomed.</p> <p>As outlined above (recommendation 1), the Federation also believes that there would be less of a reliance such bridging provision if learners were provided with an opportunity to opt to continue with a mix of academic and technical qualifications from age 16 onwards.</p>	<p>The Federation supports the development of bridging provision and believes Awarding Organisations are well placed to work with DfE in developing this provision. We would welcome close liaison with AOs during the implementation of this recommendation.</p>

<p>support adults returning to study.</p>	<p>We do not believe that requiring learners to make a choice at age16, irrespective of whether they are ready or not, is in the best interests of the learner and may set them on a pathway that they later feel is unsuitable to them.</p>	
<p><b>Recommendation 5:</b> We recommend that a common framework of 15 routes is established which encompasses all employment-based and college-based technical education at levels 2 to 5.</p>	<p>The Federation looks forward to the provision of further information on the occupations that are covered by each of the 15 routes and we understand that DfE will shortly begin to publish occupational maps for each route to address this need for clarity. In the absence of this information it is not possible to clearly establish a position on the proposed routes and how effectively they encompass the technical education needs of the country.</p> <p>There have been early concerns raised about the coverage of the 15 routes and <a href="#">AELP</a> has estimated that ‘on the basis of the figures provided, we believe that 57% of jobs in our economy are outside the recommendation’s scope, so we are in danger of creating an elitist system that would deny many young people a work based learning route to level 2 or 3.</p>	<p>The Federation supports the 15 routes, providing the occupational mapping that DfE is conducting at present, clarifies all of the occupations that sit within a route and ensures that current concerns about the perceived omission of key job roles are addressed.</p> <p>To ensure the routes are fully reflective the Federation believes that the DfE should consult widely with sector representatives, professional bodies, providers, the careers service etc. on the occupational maps before they are finalised. The Federation is happy to support DfE in accessing the expertise within AOs to sense-check any draft mapping documents.</p>
<p><b>Recommendation 6:</b> The 15 technical education routes should provide training for skilled occupations where there is a substantial requirement for technical knowledge</p>	<p>In terms of occupations that do not sit within one of the 15 routes, the Federation is not clear how the decision will be made about whether or not an occupation is sufficiently ‘technical’ and what opportunity there will be for consultation on any proposed exclusions from the routes. The Federation would welcome broad sector consultation activity to ensure that any exclusions are based on evidence drawn from a sector and not based solely on the views of a small panel of sector ‘experts’.</p>	<p>In implementing this recommendation, the Federation believes that:</p> <ol style="list-style-type: none"> <li>1. Where an occupation is excluded from the 15 routes, the DfE should publish a full rationale for this decision and consult widely on its</li> </ol>

<p>and practical skills. We are clear that occupations which require little or no technical knowledge and skill fall outside the scope of technical education.</p>	<p>It is also not clear what education provision will be made available for occupations that are deemed to not be sufficiently technical to be included in the 15 routes and we would welcome clarification about how the government will support learners who wish to move into any of these occupational areas. In the absence of such information there is a legitimate concern that there will be no educational provision available to support the development of the workforce of the future. For example, although there is a creative and design route there is no reference to either music or the performing arts. DCMS statistics 2015 show that there are 2.9m jobs in the creative economy and £19.8bn in creative exports in 2014. It will be vital to ensure the skills exist to support the continued growth in this sector in the future.</p> <p>It is also not clear what the position will be if there is a trailblazer apprenticeship standard for a job role that does not fit within one of the 15 routes e.g. retail. Greater clarity on how the technical routes relate to the trailblazer apprenticeships would also be useful.</p>	<p>position prior to a final decision being made.</p> <ol style="list-style-type: none"> <li>2. DfE should also make it clear how learners who wish to enter any 'excluded occupations' will be supported by the education system and employers to secure these roles.</li> <li>3. Any reference to these 'excluded occupations' should ensure that their value to individuals and the economy are promoted and not undermined or presented as 'second rate' in any way.</li> <li>4. There should be a clear map to show how the trailblazer standards and remaining apprenticeship frameworks fit into the 15 routes.</li> </ol>
<p><b>Recommendation 7:</b> The remit of the Institute for Apprenticeships should be developed and expanded to encompass all of technical education at levels 2 to 5.</p>	<p>The ambition for an expanded remit of the Institute for Apprenticeships (IfA) is evident throughout the report and many of the recommendations require some action from the IfA. Such an emphasis on the IfA is interesting and also gives rise to some concerns given that so little information is currently available on the IfA, the progress that is being made to establish it, how big it will be and the level of resources that will be made available to it in the short, medium and long-term. The Federation has some reservations</p>	<p>In implementing this recommendation, the Federation believes that DfE should:</p> <ol style="list-style-type: none"> <li>1. In the short term, provide information on the scope, scale and resources of the IfA. At present,</li> </ol>

<p>The Institute should be responsible for assuring standards and bringing relevant experts together to agree the technical knowledge, practical skills and behaviours to be acquired in each route for both apprenticeships and college-based provision. This will allow the Institute to maintain a single, common framework of technical education standards, qualifications and quality assurance.</p>	<p>about such a wide and important remit being given to an organisation that does not yet exist and which has recently lost its shadow CEO so soon into their tenure. Increased communication about the development of this organisation would be welcomed. It is also worth noting that the IfA will be a new organisation that will require time to gain the level of corporate competence required to effectively deliver such an extensive remit.</p> <p>This expanded remit of the IfA also raises a number of question in relation to how the IfA will function alongside the current qualifications regulator, Ofqual, and what impact the emergence of the IfA will have on the role and remit of Ofqual in relation to technical qualifications. The Federations' members have invested significant resources into working with Ofqual and its evolving approach to regulation over the past 6 years. Any transfer of the regulation of technical qualifications to IfA would be likely to have a similarly significant impact on our members. The Federation is keen to ensure that our members do not experience an increased burden in terms of regulation or oversight by Ofqual (Qualifications Wales and CCEA Regulation) plus the IfA. We would welcome assurance that steps will be taken to ensure that duplication or overlap in activity between the two agencies will be avoided.</p>	<p>little is known about how the Institute will operate. The timeline for establishing it in April 2017 now seems challenging as there is no publicly available information on the progress that has been made to date.</p> <ol style="list-style-type: none"> <li>2. Ensure the dialogue with Ofqual, Ofsted, QAA and other bodies that currently have a remit in this space, is detailed and on-going to ensure there is no over-lap/conflict in roles and responsibilities. Over regulation of qualifications and multi-agency regulation should be avoided as this diverts resources away from areas of qualification design and development which most benefit providers and learners e.g. research, innovation etc.</li> <li>3. Take steps to ensure that the regulation of technical qualifications remains with Ofqual and that IfA does not duplicate this activity or adopt approaches that conflict with Ofqual regulation.</li> </ol>
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<p><b>Recommendation 8:</b> While it is right for the Institute for Apprenticeships to be delegated wide-ranging autonomy across its operational brief, responsibility for key strategic decisions must be reserved for the Secretary of State. Crucially these decisions include those relating to the shape of the overall national system of technical education (such as adding new or removing existing routes, or changing the title of a route) if we are to ensure the new system remains coherent and stable over time.</p>	<p>The Federation can understand the rationale for the continued strategic involvement of the Secretary of State in the shape of the overall system of technical education. However, there are some challenges presented by such an approach which present a risk to the system. The amount of change that the system has been subjected to in recent times is significant and the City and Guilds report '<a href="#">Sense and Instability</a>' illustrates this well. The lack of consistency and opportunity to bed in approaches and systems has not done any favours to those who have strived for many years to present vocational/technical learning as a worthwhile and valued alternative to the more traditional academic routes. The risk of having the SoS so closely involved is that the frequency of change in terms of who holds the SoS post (for example, we have had 3 Secretary of State for Education since 2010). Each successive SoS will probably bring their own views of technical education to the role and there is a risk that this will result in further reviews and fundamental changes to the system. There is a need for consistency and time to 'bed-in' a technical education system and Nick Boles commented on the importance of this in his introduction to the Skills Plan. The Federation believes that the change and churn in the system in response to government policy changes has damaged the image of technical education and has probably contributed more to any confusion that exists in the mind of employers and learners than the number of qualifications. The Federation would like to see a firm commitment to providing future policy stability in relation to the technical education system.</p>	<p>The Federation believes that if we are to avoid the mistakes of the past which led to frequent changes being made to vocational/technical education it is important that the consistency in approach needs to be maintained, not just in this parliament, but in the long term. To achieve this we believe that there should be ongoing oversight of the technical education system by a cross- party independent panel who can advise the SoS on any proposed changes and whether they risk destabilising or causing unnecessary upheaval to the technical education system.</p>
<p><b>Recommendation 9:</b> We recommend the Institute for Apprenticeships convenes panels of professionals to advise on the knowledge,</p>	<p>The Federation understands the value of having employers involved at the heart of the development of technical education which will be critical to ensure they have the workforce they need for the future. However, the proposed panel approach raises a number of concerns for the future, including:</p>	<p>As outlined above in recommendation 3, the Federation believes that there is a role for these Expert Panels but that they should be part of a broader system to develop and maintain occupational standards.</p>

<p>skills and behaviours to be acquired for the standards in each route and on suitable assessment strategies. These professionals should be appointed in an individual capacity, not as representatives of their employers.</p>	<ol style="list-style-type: none"> <li>1- The size of the panels and their ability to involve a sufficient number of employers to fully reflect the needs of a sector. The voice of small and medium enterprises must be well-represented.</li> <li>2- The costs associated with paying panel members and the ongoing sustainability of this approach, particularly in the medium to long-term.</li> <li>3- The availability of sufficient employer representatives with an understanding of developing standards that are relevant across a sector and not just for their current employer.</li> <li>4- The likelihood of the resulting standards being too role-specific (as we have seen with some of the current apprenticeship Trailblazers).</li> </ol>	
<p><b>Recommendation 10:</b> Institute for Apprenticeships panel members should be remunerated from the public purse.</p>	<p>As we have stated above, the mid to long term sustainability of the proposed model where panel members would be paid is a concern, especially in an economic situation where the public purse is becoming increasingly pressurised.</p> <p>Consideration should also be given to how long it will be before the “experts” begin to see themselves as civil servants rather than members of their designated industry sector, the risk this approach presents in terms of the panels over-emphasising the views of a small group of employers, how long members will serve on the panel etc.</p>	<p>As outlined above in recommendation 3, the Federation believes that use of the panel members at key stages within a broader system of standards development will make best use of their time and will, consequently, reduce the burden on the public purse.</p>
<p><b>Recommendation 11:</b> At the earliest opportunity, the Institute for Apprenticeships reviews all existing apprenticeship standards to satisfy itself that there is no substantial overlap between standards, and</p>	<p>The Federation believes that this recommendation illustrates one of the key issues relating to some of the standards developed by the employer-led apprenticeship Trailblazers. Some of the resulting standards are too role-specific and have too narrow a focus e.g. golf green-keeping. We therefore understand the recommendation of the Panel and welcome it to some extent. However, we also recognise the potential difficulties that the acceptance of this recommendation by the government could create in relation to current apprenticeship policy and the drive to encourage assessment</p>	<p>The Federation believes that work should be commissioned without further delay to review the current standards and provide an initial indication of those that are likely to be reviewed/withdrawn in the near future. This information should be published so that end-point assessment providers can avoid investing valuable resources into the</p>

<p>that every standard is occupation- rather than firm-specific and contains sufficient technical content to warrant at least 20% off-the-job training. Standards found to be overlapping or wanting in terms of breadth or technical content should be revised, consolidated or withdrawn.</p>	<p>organisations to join the SFA's Register of Apprentice Assessment Organisations (ROAAO).</p> <p>Approximately half of the new trailblazer apprenticeship standards which are published on the ROAAO do not yet have an approved assessment organisation. This means that for some standards, learners are actively working towards an apprenticeship without assurance that a provider of the required end-point assessment is available. By committing to a review of standards so soon after their launch, there is a risk that assessment organisations may be less likely to invest in the development of an end-point assessment if there is the possibility that the apprenticeship standard could be reviewed or withdrawn in the near future. The development of an end point assessment for some standards will already be marginally financially viable and a short term review will only add to any existing reluctance to invest in them.</p>	<p>development of the EPA for these standards. We also believe that it is not in the interests of learners for recruitment onto these standards to continue in the short-term and they should be 'frozen' until a final decision has been made on their future availability.</p> <p>Standards should not be described as "approved for delivery" unless there is an end point assessment available.</p>
<p><b>Recommendation 12:</b> We recommend the Government moves away from the current awarding organisation market model, where qualifications which deliver similar but different outcomes compete with one another, and instead adopts a licensing approach. Any technical education qualification at levels 2 and 3 should be</p>	<p>The Federation believes that this recommendation is anti-competitive and will result in market monopoly situations that will not be in the best interests of providers, learners or technical education. We find it extraordinary that such a proposal can be presented by the independent panel, and even more extraordinary that it has been accepted by government, without any <b>evidence</b> to support the claim that competition in the market has led to the so-called 'race to the bottom'. We could similarly say that we believe the current supermarket price war on school uniforms has undermined the quality of the products available and resulted in 'a race to the bottom' but, like Lord Sainsbury's panel, we would have no evidence upon which to base such a claim. We believe competition in the market exerts positive pressures on AOs to take steps to ensure their qualifications reflect the needs of employers, are up to date and innovative. Competition drives a race to the top, not the bottom.</p>	<p>The Federation does not accept that competition has driven a race to the bottom and believes it has had the opposite affect; stimulating innovation, high levels of customer service and improved links with employers.</p> <p>In moving forward with the implementation of this recommendation the Federation believes that the risks associate with creating monopoly positions for a small number of AOs should be avoided to ensure learners and providers do not experience any unintended adverse effects.</p>

<p>offered and awarded by a single body or consortium, under a licence covering a fixed period of time following an open competition.</p>	<p>The Federation believes that competition in the qualifications market has many benefits and stimulates innovation, increased customer care and increased responsiveness to employer and learner needs. By removing competition from the market, the Federation believes a number of risks are presented, including:</p> <ul style="list-style-type: none"> <li>- The loss of a key incentive for innovation in content and assessment design, including the development of technology based solutions. Awarding Organisations (AOs) currently strive to improve and innovate in these areas.</li> <li>- A stagnation in the market offer, where one qualification remains available for a 5-10year period regardless of whether it continues to reflect the needs of employers and the economy. AOs can currently be responsive to the needs of employers, colleges and learners to ensure the qualifications on offer really do deliver what is needed in the current and future jobs market.</li> <li>- A loss of medium to long-term alternatives, where one AO is selected to award a qualification in the market for a number of years the currently available choices will disappear and are unlikely to still be available at the point of re-tendering.</li> <li>- The loss of a key incentive to provide higher and higher levels of customer service standards for colleges and other providers. AOs currently compete on this basis and this brings many benefits to the market place.</li> <li>- A potential increase in prices for providers who have no choice other than to buy from the one AO that has won the tender for a 5-10 -year period.</li> <li>- An increased risk to providers, learners and employers if the awarding organisation encounters financial or resource difficulties which impact on service levels. At present, were there to be crisis there is likely to be another AO available (or a number of them) to step into ensure learners are supported to complete their qualifications. In a monopoly situation this will not be the case, leaving the government with a difficult situation to resolve.</li> </ul>	<p>We believe that DfE should consider the model that is operated by QAA in the Access to HE market. In this model, one qualification is offered by a number of AOs and there is standardisation across the AOs activity to ensure the standard is maintained. This has the advantage of:</p> <ul style="list-style-type: none"> <li>- offering one qualification to the market (which will avoid any perceived confusion).</li> <li>- ensuring the standard is the same, whichever AO a provider uses.</li> <li>- avoids any potential for the perception that AOs are competing on the basis of the standard required to achieve the qualification.</li> <li>- continues to allow providers and learners to benefit from competition in terms of price, customer service, support materials, sector expertise, innovation etc.</li> <li>- will motivate AOs to continue to improve their service offer to providers and learners.</li> </ul>
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	<p>The Federation does not support the references in the report to there being too many qualifications available. In reality, one qualification may be offered by a number of different AOs (thus offering providers, employers and learners choice and the benefits arising from a competitive market). The Federation believes that the counting approach has resulted in cases where one qualifications has been counted many times.</p> <p>Irrespective of the counting approach employed, we do not agree that the choice available in the market is a bad thing. Any confusion the Panel found could just as easily be attributed to the frequent changes that are applied to the technical education sector by changes in government policy. For example, the 14-19 Diplomas which were launched in 2008 and withdrawn by government in 2011 may have caused some confusion to employer and the thousands of learners who enrolled on them. In addition, the Federation believes that the withdrawn national Qualifications and Credit Framework (QCF) encouraged AOs to award similar qualifications and now that this has been replaced by the Regulated Qualifications Framework we may well see a natural decline in the number of regulated qualifications. We need to give this new system time to settle in relation to how it may impact on qualification numbers.</p> <p>It is also worth noting that choice in other educational markets does not appear to be viewed as confusing or necessary – for example, there continues to be a choice in GCSE and A level markets and there are even higher number of qualifications available in one subject area in the HE market (for example 2,249 English Degrees available via 140 HE providers for 2017). It is not clear why the panel chose to view choice as a negative in the technical education market, particularly in the absence of any evidence to support this position. It is also an interesting position to take in the light of the recent</p>	<ul style="list-style-type: none"> <li>- protects providers, learners and government from the impact of sudden market failure as there will be other AOs already in the market who can step in to assist should one AO fail.</li> <li>- removes any challenges associated with one licence holding AO needing to scale up provision to meet the demand from all providers and learners for that qualification across England.</li> </ul> <p>We believe DfE should award a single licence to one qualification that meets the needs of the occupation but allows a number of regulated AOs, who meet Ofqual's General Conditions, to award the qualification.</p>
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	<p>move to open the apprentice end point assessment market up to increased competition by allowing bodies other than regulated AOs access to the SFA's ROAAO.</p>	
<p><b>Recommendation 13:</b> The Institute for Apprenticeships should maintain a register of approved technical education qualifications at levels 4 and 5 that meet the standards set by its panels of professionals. Only qualifications on this register should be eligible for public subsidy.</p>	<p>The Federation believes that learners who take out loans to fund their continued learning should have greater freedom to decide what to purchase with the loan. This will allow them to exercise their consumer rights to make an informed buying decision with the funds that they will be paying back for a number of years, plus interest.</p> <p>At level 4 and 5 'the public subsidy' that is available is in the form of advanced learner loans. We do not believe that learners should be restricted to a what could be a narrow selection of qualifications at levels 4 and 5, linked to the 15 routes. If, as we fear, the standards developed by the professional panels are too narrow and do not represent the needs of the whole sector then it is likely that Professional Bodies will rightly opt not to map their qualifications to such standards. Such a decision, taken to protect the integrity of their qualifications, would automatically mean that their qualifications would not be funded via loans. This does not seem to deliver a result that will help to ensure learners can continue to learn and achieve throughout their careers at increasingly higher levels.</p> <p>If choice is to be restricted, we believe the provision at level 4 and 5 should be fully funded and not loans based. It does not seem reasonable that an individual should be liable for the repayment of a loan when they are not at liberty to spend it on learning that they feel best meets their needs.</p>	<p>The Federation supports this recommendation IF the standards are developed in way that ensures they fully reflect the needs of employers and learners and this has been tested with, and supported by, a high number of employers and relevant professional bodies. We also believe that in the interests of progression and flexibility that the recognition process of level 4 and 5 qualifications by the IfA should ensure that a wide range of qualifications are available to learners and their choice of qualifications that are eligible for advanced learner loans should not be unduly restricted.</p>
<p><b>Recommendation 14:</b> The Government should undertake further work to examine how to ensure clear progression routes</p>	<p>The Federation agrees that clear progression is important and supports the recommendation for further work in this area.</p>	<p>The Federation believes that professional bodies should be engaged in this work and we would be happy to support DfE by providing access to our professional body members.</p>

<p>develop from levels 4 and 5 to degree apprenticeships and other higher education at levels 6 and 7. This work should be carried out in the context of existing and proposed structures and funding rules for higher education provision in England.</p>		
<p><b>Recommendation 15:</b> Every college-based route should begin with a two-year programme suitable for 16-18 year olds (although some individuals may take more or less time to complete it). Each of these two-year programmes should begin with a 'common core' which applies to all individuals studying that route and is aligned to apprenticeships.</p>	<p>In principle the Federation does not disagree with the recommendation for a common core. However, in the absence of any further detail it is difficult to understand how this core could be made meaningful to the wide range of occupations included in each of the 15 routes. Although we can understand there will be some common areas that all learners will need to study it is not apparent whether there will be sufficient commonality to fill one -year of study. We also question how the delivery of the common core will be flexible enough to allow learners to move through it and complete at their own pace. We look forward to further information on how this common core will operate.</p>	<p>Detailed mapping will need to be undertaken to establish what sits in this common core and ensure it is meaningful to learners and employers in each of the wide range of occupations within each of the 15 routes.</p>

<p><b>Recommendation 16:</b> After the common core, individuals should specialise to prepare for entry into an occupation or set of occupations.</p>	<p>The Federation believes that the opportunity to specialise, for those who have a clear view of where they want to go, is an important one. We understand that some learners will have identified an occupation that they wish to progress into and it is important that there is provision available to support them to reach their goal, especially where this includes the achievement of a recognised professional qualification that is recognised and valued by employers in their sector. However, not all learners will be ready to choose a specialism which is why we believe there should be a third option available to learners at age 16 to continue to study a mix of technical and academic subjects.</p> <p>It is not clear how the specialisation for ‘a set of occupations’ would work and further information is required on how occupations would be grouped and the logic behind these groupings. At the moment, the range of occupations in the 15 routes is so broad in some cases that it is difficult to see how any groupings could be made. For example, the Creative and Design route includes journalists, furniture maker and graphic designer which all require completely different skills and knowledge.</p> <p>It is also not clear what the expectations would be in relation to providers of a route. If a route offered specialisms in 10 occupations, would every provider be required to offer all 10 of these specialisms? If so, there is a question about the availability of provider resources to offer and deliver such a wide range of choices to learners.</p>	<p>The Federation supports the recommendation that learners should be provided with an opportunity to specialise. We look forward to seeing further information on how this will operate in reality.</p> <p>A number of sectors have widely-recognised and well-established qualifications which provide access to employment; it is important that learners are offered an opportunity to gain these qualifications.</p>
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<p><b>Recommendation 17:</b> We recommend that, in addition to any separate requirements as a result of the English and maths funding condition, there is a single set of maths and English ‘exit’ requirements governing college-based technical education and apprenticeships. These should be seen as the minimum level of maths or English which all individuals must achieve ahead of securing technical education certification, as is already the case for apprentices.</p>	<p>The Federation agrees that English and maths are important for learners and that they should feature in technical education and apprenticeships. However, we also feel that:</p> <ul style="list-style-type: none"> <li>• The qualifications/provision that occupies this space must not be overly focused on the achievement of GCSEs or A levels. Qualifications such as Functional Skills in math and English should also be options for learner who find it easier to demonstrate their skills in these subjects in a more applied context.</li> <li>• The ‘exit requirements’ must be in line with the real needs of the sector and care should be taken to ensure that the requirements are fair and do not present unnecessary barriers to learners.</li> <li>• Ways to ensure the effective teaching of these subjects to a wide range of learners should be considered and supported in the future.</li> </ul> <p>The recommendations of the current Post-16 Maths review will need to be considered during the detailed implementation of this recommendation.</p>	<p>The Federation supports a focus on the achievement of appropriate levels of English and maths as part of the technical education routes. We believe a choice of qualifications should be available to learners and there should not be an over-emphasis on GCSEs.</p>
<p><b>Recommendation 18:</b> In the longer term, as the quality of pre- and post-16 maths and English teaching and associated learner outcomes improve, government should raise</p>	<p>The Federation understands the aspiration of the government to raise levels of English and maths attainment and is fully supportive of developments which help learners to gain skills in these areas. We feel it is important that the requirements in these areas should be driven by the real needs of each sector and not by a desire to achieve a higher ranking in international tables. The barriers that higher requirements could present to certain learners must be considered, otherwise we will find that some learners are</p>	<p>Action to achieve this aspiration should be driven by employer needs and not a political desire to increase ratings in international tables.</p>

<p>maths and English requirements to reflect those of higher-performing international technical education systems.</p>	<p>excluded from technical education routes that would otherwise have offered them a pathway to social mobility and full and rewarding participation in the workforce.</p>	
<p><b>Recommendation 19:</b> We recommend the Institute for Apprenticeships encourages its panels of professionals to incorporate additional, occupation-specific maths and English requirements into the standards for each route.</p>	<p>As stated above, the Federation is supportive of the need to include English and maths in the technical education routes, including the functional skills qualifications which provide a more applied way to assess learner’s skills in these areas. However, as previously stated, we do have some concerns about the ability of the panels to represent the views of a whole sector. We also feel there should be some assurance provided of the independence of the panels and a commitment from government not to exert any pressure on the panels to elevate the English and maths requirements beyond what is required by the sector.</p>	<p>The Federation believes that if a broader process for the development of occupational standards is adopted (see recommendation 3) that the identification of the required English and maths skills will be a more organic part of the process.</p>
<p><b>Recommendation 20:</b> In addition to work taster or short-duration work experience opportunities, every 16-18-year-old student following a two-year college-based technical education programme should be entitled to a high-quality, structured work placement.</p>	<p>Work placements of the right quality can be an incredibly effective and enriching part of a learners’ experience; opening their eyes to the reality of working in a particular type of role for a real employer. The Federation is supportive the opportunities these can offer to learners. The availability of placements of the quality and duration that will be required and the ability of employers to provide these placements in the number required to implement this recommendation is an area that should be explore in greater depth to ensure this aspiration is deliverable. There is a risk that without increased employer engagement this recommendation could become a barrier to learners’ achievement of full certification or that providers will be put in a position where they need to find a ‘work around’ which does not offer the same quality of outcome for the learner.</p>	<p>The Federation believes that there should be consideration given to establishing a role for the IfA, or another organisation, to generate work placements and a central database of opportunities for providers to use to access the right number and calibre of placements. Without some central support we believe it is highly unlikely that providers will find a sufficient number of employers who are willing/able to provide placements of the right calibre, in the right</p>

<p>Successful completion of this work placement should be a requirement for full certification at the end of the study programme. As part of the work placement, the student, college and employer should complete a log book – ideally online – that evidences the key tasks the student has undertaken and what they have learnt.</p>		<p>areas. We also believe that this requirement, at least in the short term, cannot be a mandatory requirement for overall certification of the route. If it is, we believe it will act as a significant barrier to learner achievement.</p>
<p><b>Recommendation 21:</b> We recommend the Government makes additional funding available to colleges to support work placements for technical education students on college-based study programmes. We suggest the most straightforward way of doing this is to increase the base rate per student for each 16-18-year</p>	<p>The Federation welcomes the panel’s recognition of the extra funding required to support the work placement requirement and we look forward to the conclusions of the further work required to determine the precise amount that will be required. We would welcome early assurance from DfE that if further funding cannot be allocated to support this requirement that it will not be implemented as a mandatory requirement for certification in a technical route. We are concerned about the availability of the funding required to support the ongoing implementation of the recommendations, especially in a post-Brexit economy which may present some significant challenges for government budgets.</p>	<p>The Federation supports this recommendation.</p>

<p>old technical education student who successfully completes a work placement. Initial evidence suggests that such an uplift might need to be around £500 per placement, but further work will be required to set the precise figure.</p>		
<p><b>Recommendation 22:</b> For both employment-based and college-based technical education at levels 2 and 3, there should be a single, nationally recognised certificate for each technical education route.</p>	<p>The Federation understands the aim of having a nationally recognised certificate for each technical education route and we understand that initial thinking is for the IfA to lead on issuing these certificates. This responsibility will have a major resource implication for the IfA in terms of them gathering evidence of learner achievement, checking the evidence of achievement of all of the required components and then issuing the certificate in a timely manner. This should be taken into account in the plans to set-up and resource the IfA.</p>	<p>The Federation believes that, because of the breadth of occupations within each route, these certificates would need to state the specific pathway that a learner had pursued if they are to be meaningful to learners and employers.</p> <p>We would further like to see a modular approach, recognising the achievement of learners who have not completed the whole programme for some reason e.g. ill health. This recognition will be in the best interests of the learner and will help them to resume their education at the correct point as soon as they are able.</p>
<p><b>Recommendation 23:</b> For college-based technical</p>	<p>As stated above, the Federation does not believe that this approach will deliver positive benefits for learners, providers or employers and we find it highly surprising that the</p>	<p>As we have outlined above, one qualification for each occupation or cluster</p>

<p>education at levels 2 and 3, we recommend that the system of qualifications is simplified dramatically, with only one tech level qualification approved for each occupation or cluster of occupations.</p>	<p>government has accepted such a proposal without any consultation, assessment of the impact on learners, providers and AOs, or any evidence that the current market operation causes problems. We believe that a move towards the proposed market model will stifle innovation, lead to price increases and make the technical education system less responsive and agile.</p>	<p>of occupations could work for providers and learners as long as more than one AO can award these qualifications which will ensure the market does not suffer from the impact of behaviours commonly associated with monopolies.</p>
<p><b>Recommendation 24:</b> We recommend the Government restricts public subsidy for college-based technical education to that leading to qualifications approved by the Institute for Apprenticeships. This includes funding for 16-18 year olds and advanced learner loans available for adults aged 19 and older.</p>	<p>The Federation understands that the government would want to focus its funding on supporting its model for technical education in the future. However, as we have outlined above, the Federation believes there should be greater freedom afforded to individuals to purchase qualifications at level 4 and 5 when they are taking on the responsibility of a loan which they will be liable to re-pay.</p> <p>In terms of the funding for levels 2 and 3, it is not possible to comment on this proposal without a clear and full picture of the occupations that will be included in each of the 15 routes and the occupations that will be excluded. The Federation believes there should be careful analysis of the occupations and associated qualifications that fall outside of the 15 routes before the focus of funding is narrowed to the proposed extent. If an occupation is excluded from a route and a learner wished to pursue a career in that direction and achieve a qualification to support their progression, the proposal would mean that there would be no government funds to support them. This in effect means that from an early age some learners will either have to follow a route that they do not really want to follow, somehow pay for their own qualifications or opt out of achieving further qualifications. For example, retail does not appear in one of the 15 routes. If a learner wished to pursue a qualification in retail and an apprenticeship was not available</p>	<p>The Federation would like to see close working between IfA and Ofqual to ensure the 'approval' of qualifications by IfA does not duplicate or compromise the work of the regulator and add burden to AOs. A full mapping of roles and responsibilities should be carried out to ensure the approaches of the two bodies sit comfortably side by side and do not conflict.</p>

	<p>to them, how would they be able to pursue this and continue to achieve qualifications to illustrate their progression? The Independent Panel may have decided that certain occupations should not sit under the banner of technical education but this does not mean that they do not offer valuable job roles with a positive impact for learners and the economy as a whole. There should be a full exploration of these 'non-technical' areas with a view to considering how government may fund learners to achieve qualifications in such areas.</p>	
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<p><b>Recommendation 25:</b> For college-based technical education we recommend the Institute for Apprenticeships publishes guidance on the use of a range of common assessment strategies, makes assessment expertise available to the panels of professionals, and sets overarching quality criteria to apply to all tech levels.</p>	<p>The Federation agrees that the provision of assessment expertise to the panels is essential. The skill required to design effective and valid assessment should not be underestimated and should not be left to those who do not fully understand the intricacies of good assessment. Awarding organisations are well placed to provide such expertise and may be able to offer assistance to the IfA in fulfilling this requirement.</p>	<p>The Federation recommends that IfA works with AOs to use the existing assessment expertise within awarding organisations to support the work of the panels. The Federation would be happy to facilitate dialogue with our members to achieve this.</p>
<p><b>Recommendation 26:</b> Regardless of the forms of assessment used, all qualifications in college-based technical education should assess both the common core for the relevant route and the specialist / occupation-specific knowledge and skills. The assessment of every technical education</p>	<p>Awarding organisations are well placed to develop valid assessments for qualifications within the routes for both the common core and the occupation specific knowledge and skills. The Federation does however believe that assessment experts should be allowed the freedom to determine the most effective way to assess a particular area without parameters being specified by government. There will, for example, be some sectors where external assessment is not the most appropriate way to assess learners. We do not believe that requiring assessments to fit a one-size fits all model is the most effective approach to secure high quality, valid assessments. AOs should have the freedom to develop assessment approaches that are most appropriate for the qualification, the sector and the learners.</p>	<p>The Federation would like to see further work undertaken by DfE on this area to explore how consistency and reliability can be achieved. They are not automatically the result of external assessment and it would be erroneous to implement this recommendation on this belief. We believe that a wider exploration of the issues is required, followed by a consideration of ALL of the options for achieving appropriate levels of consistency and reliability.</p>

<p>qualification should include realistic tasks as well as synoptic assessment which, together, should be designed to test a student's ability to integrate and apply their knowledge and skills. All qualifications should include external assessment to ensure comparability and reliability.</p>	<p>It is also important to note that we have a qualifications regulator in England that has validity at the heart of its regulatory model. The Federation believes this focus on validity is helpful and provides the flexibility for assessment experts to determine the most appropriate assessment approach for each individual qualification, as long as this results in a valid qualification. This approach is preferable to the determination of a set of design rules that may well undermine the validity of some qualifications.</p> <p>It is also worth noting that the application of external assessment to a qualification does not in itself ensure either reliability or comparability.</p>	
<p><b>Recommendation 27:</b> Individuals who are not ready to access a technical education route aged 16 (or older if their education has been delayed) should be offered a 'transition year' to help them prepare for further study or employment. The transition year should be flexible and tailored to the student's prior attainment and aspirations.</p>	<p>The Federation agrees that learners who are not ready to progress should be supported to develop the skills and knowledge they require to move into an apprenticeship of college-based provision. Supporting every learner to achieve the best they can, should be the focus of our education system.</p> <p>The level of funding required to support this additional transition time will need to be sufficient to ensure all learners who require it can access it and that it provides worthwhile learning opportunities. If this transition time is to truly be 'flexible and tailored' the funding will need to support providers to deliver this as it will require additional resource. Also, the funding for a further 2 years of study must also then be made available for all those who have undertaken a transition year if they are to be able to continue to progress in their chosen route.</p>	<p>The Federation supports this recommendation if the provision can be made sufficiently flexible to meet the needs of a wide range of learners. We would also like to see an exploration of the provision of Entry and level 1 qualifications as part of this transition phase to support learners in increasing their confidence and their progression, and to measure the effectiveness of training provision.</p>



<p><b>Recommendation 28:</b> We recommend the Government commissions additional work into the design and content of a transition year, while ensuring the key objective for the year is offering tailored provision with a sharp focus on basic skills and progression. Such work should be undertaken in good time to ensure the new transition year is available to students alongside first teaching of the technical education routes.</p>	<p>The Federation believes this additional work is needed to provide clarity of how this transition year would work in reality and how providers will be able to provide the flexibility and tailoring that the year is intended to provide. It is not immediately clear how providers can be expected to offer such a bespoke service to a range of learners with a range of different needs, without significant funding to support the resources required to do this.</p>	<p>The Federation supports this recommendation.</p>
<p><b>Recommendation 29:</b> We recommend the Government adopts the Gatsby benchmarks as the basis of a common national approach for careers education and guidance, and sets an expectation for</p>	<p>The Gatsby benchmarks provide a sound basis for a common national approach to careers education and guidance. We are particularly supportive of benchmark 7 which aims to ensure FE colleges have access to schools to provide learners with information on the course they can offer and this will be particularly important if learners are to have the opportunity to consider a move into the technical education routes.</p>	<p>The Federation supports this recommendation.</p>

<p>schools and colleges to use the benchmarks when developing their careers provision.</p>		
<p><b>Recommendation 30:</b> Government should support schools and colleges to embed into careers education and guidance, from an early age, details of the new 15 technical education routes, so that young people and their parents understand the range of different occupations available and how to reach them.</p>	<p>The provision of accurate, clear and accessible information on the 15 technical routes for learners and their parents will be particularly important. As we outline below (recommendation 31), there is a risk that other government policies will restrict the opportunities for learners at KS4 to participate in any non-GCSE learning. This makes it more crucial than ever that information is made available to support learners who do not wish to continue with the academic route that they have been offered up to the age of 16. Having information that is also aimed at parents will be crucial as they will be highly likely to be a source of advice and will, in many cases, have a great influence over their children's choices.</p>	<p>The Federation supports this recommendation.</p>
<p><b>Recommendation 31:</b> The National Careers Service should review how it presents its career information and guidance in the light of our recommendations for reform of the technical education system.</p>	<p>The Federation supports the need for the provision of clear careers guidance to young people to help them to make informed choices at the age of 16. However, we question whether the proposed 90% target for the uptake of Ebacc subjects in schools would provide sufficient opportunity for learners to experience technical learning in any form prior to making their decision at age 16 on whether to pursue the academic or technical option. Our concern is that learners will only know and understand academic learning and will continue with that in the absence of clear information on the alternatives.</p>	<p>The Federation supports this recommendation.</p>

<p><b>Recommendation 32:</b> We recommend that the ONS examines how to make the Standard Occupation Classification (SOC) more relevant for stakeholders – including expanding it to 5-digits. We further recommend that the Government explores how to make more occupational information available to the Institute for Apprenticeships, colleges and individuals by supplementing the nationally collected datasets with information from the American O*NET system and other sources.</p>	<p>The Federation is supportive of activity to make the Standard Occupation Classification more relevant.</p>	<p>The Federation supports this recommendation.</p>
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<p><b>Recommendation 33:</b> We recommend that, when national and local decisions about the provision and funding of technical education are being taken, consideration is given to restricting funding to colleges and training providers which meet clear criteria of quality, stability and an ability to maintain up-to-date equipment and infrastructure.</p>	<p>The Federation agrees that in the interests of learners it is vital that the quality, stability and facilities provided by providers are assured.</p>	<p>The Federation supports this recommendation.</p>
<p><b>Recommendation 34:</b> We recommend the Government reviews what constitutes sufficient funding for technical education to deliver on its aims of meeting employer needs. This work should benchmark expenditure in England against that in other countries and be used to set appropriate</p>	<p>The Federation believes this is a key recommendation of the Panel and the report makes it clear that there are dangers associated with not funding the technical education system sufficiently in the future. We have already heard from DfE (AOVQ July 2016) that DfE will continue to operate within the existing Spending review envelope and that future funding levels will be determined through the normal SR process. It remains to be seen what levels of funding are provided in the future and whether the warnings of the Independent Panel on implementation without appropriate funding are heeded.</p>	<p>The Federation believes that the government should, in the short term, confirm its commitment to a full funding review of technical education to ensure it will be able to provide the funds required to implement the recommendations and support them fully once they are implemented. The analysis will need to consider the views of providers, in particular.</p>

funding levels for technical education when the new routes system is introduced.

If the public purse is unable to support the proposed changes then the Federation believes the government should not embark upon implementation that is likely to fail because of the lack of the required funds.