

Federation of Awarding Bodies –response to the Building our Industrial Strategy Green Paper, April 2017

Overview of the Federation of Awarding Bodies

The Federation of Awarding Bodies is the trade association for vocational and technical awarding organisations (AOs) with 125 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies. Our members offer a range of qualification types and levels to support skills development in numerous industry sectors in the UK. We believe that our members' close and collaborative working with employers has added quality, validity and rigour to the assessment of the skills required by UK industry sectors.

The Federation welcomes the opportunity to respond to the Governments Industrial Strategy Green Paper which clearly recognises skills as one of the central pillars to the future success of the UK. Within that pillar, the implementation of the changes to technical education, as outlined in the Post-16 Skills Plan, play a prevalent role and these changes will have a significant impact on the technical education market within which AOs play a crucial role. Our response therefore focuses on Questions 10-14 of the consultation (and mainly Q11) and how to ensure the skills pillar contributes effectively to the wider Industrial Strategy.

This response is submitted on behalf of the Federation's membership following consultation with them and with the Federation's Board of Directors. However, AOs are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

Technical Education

The Federation welcomes the aspiration to further strengthen technical education which is critical to the future success of the UK's 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.

However, we have concerns about some aspects of the vision for the new technical education system. In some cases, this is due to the lack of detail/information currently available about how the proposed changes will be implemented. In other cases, this is due to our belief that the proposed implementation will not be in the best interests of learners, employers or providers. Our key areas of concern in relation to the current vision for the technical education system are:

1. The Federation agrees that it is appropriate to offer learners a clear route into technical or academic education, at the age of 16, in cases where a learner has made a clear and informed decision about their preferred option. We are, however, concerned that at the age of 16 some learners may not be ready to make that decision, or have the necessary quality of information, advice and guidance required to make an informed decision. We therefore believe that learners should be allowed to choose a 'third option' which allows them to blend the benefits of both academic and technical education. Providers should be given the flexibility to respond to the choices and needs of the individual learners, including where the learner wishes to pursue a 'mixed' approach to their learning at age 16-19. Learners could be offered some academic learning leading to, for example 2 A-Levels PLUS some technical learning, for example a Technical Certificate. This type of 'mixed' approach would still allow access to HE or an apprenticeship once the individual learner has made a final decision on the route that suits them best.

Related to this, we welcome the media reports in the week of 27 March that the government has decided to allow Applied General qualifications to continue and we look forward to further clarification about these qualifications and where they will sit in the post-16 landscape with the 15 technical routes.

2. 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 support competitive activity, now and in the future. We are, however, concerned that the proposed 'employer panels' could result in the voice of a few large employers defining standards that meet their needs but not necessarily the needs of the wider sector. For this reason, we believe the government should consider ways to re-engage with the work on National Occupational Standards (NOS) that the devolved nations have committed to. The planned employer panels could play a role in this approach and offer expert views on the draft NOS that would ultimately reflect the needs of a wider range of employers in a sector. Furthermore, the Federation believes that the provision of assessment expertise to the employer panels is essential, from the outset, and we welcome the recent confirmation by IfA in its draft Operational Plan that this expertise will be made available to the Panels. The skills 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 designing valid assessment. Awarding organisations are best placed to provide such expertise.
3. The Federation is awaiting the opportunity to respond to consultations on the occupational maps for each of the proposed 15 routes and we understand that DfE will shortly begin to publish occupational maps, beginning with the pathfinder routes. At present, the indicative broad coverage of the routes raises concerns about how meaningful any common core content will be as well as how meaningful a 'route achievement certificate' will be. The

commonly quoted example is that journalism and upholstery are included in the same route; Creative and Design. It is not clear how these diverse areas within a route will comfortably share any extensive or meaningful common core content. The occupational maps are not currently available for any of the 15 routes (April 2017) which further adds to our concerns about the timescales for developing provision in some of these routes for September 2019.

4. In terms of occupations that do not sit within one of the 15 routes, it is not clear what funded education provision will be made available for learners who wish to obtain qualifications in these 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.

5. The proposal to restrict the awarding market in technical education is of significant concern to the Federation. We believe this anti-competitive approach presents all of the risks traditionally associated with market monopolies and these are not in the best interests of providers, learners or technical education as a whole. We find it extraordinary that such an approach can be implemented when there is **no evidence** to support the claim that competition in the market has led to the so-called 'race to the bottom'. We believe competition in the market exerts positive pressures on AOs to take steps to ensure they work closely with employers to ensure their qualifications reflect the needs of employers, are up to date and innovative. The risks that this approach presents for learners are most concerning in regards to what would happen to any cohort of learners if there were to be market failure of a single AO. We have not yet seen any contingency plans or strategies for managing this risk.
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). The Federation believes that the government should explore the benefits of introducing a technical education market approach similar to the GCSE/A level market approach. This will manage the risk of market failure but also give the government a tried and tested approach to having one common standard across all technical qualifications in an industry sector. Similarly, the 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 is another potential way to ensure the qualification offer is the same with the added benefit of avoiding the risks associated with monopoly positions.

6. The Post-16 Plan focusses on changes to provision at levels 2 and 3 but also includes references to the qualifications at higher levels. The Green Paper emphasises the importance of these higher level skills to the future of the UK's success in a global competitive market. To support learners in their progression to higher level technical qualifications the Federation believes that learners who take out advanced learner loans to fund their continued learning should have greater freedom to decide what qualification to purchase with the loan and not be restricted by the list currently managed by the Skills Funding Agency (now part of the Education and Skills Funding Agency). This will allow learners to exercise their consumer rights to make an informed buying decision with the funds that they will be paying back, with interest, for a number of years.

The Federation also believes that maintenance loans for learners undertaking technical education at higher levels need to be expanded and not limited to those studying in Institutes of Technology and National Colleges. At the very least these should be available to support all higher level learning in subjects that focus on areas where there are current skills gaps that hold the UK back from being fully competitive. This greater availability of loans could play an important part in supporting individual to retrain when the skills needs in their area change and they need to learn new skills to continue to be in the position to positively contribute to industry and the economic strength of the nation.

7. One of the greatest concerns we have about the implementation of the changes to technical education is the proposed timescale for the introduction of the changes. The Federation believes that it is vital to get the reforms right and not launch them before there is confidence that they will work effectively and deliver a coherent system. We have seen too many reforms in the technical education sector come and go (such as the 14-19 diplomas) and we do not believe this frequent flux is desirable for learners, employers or the image of technical education. Confusion about technical education is often laid at the door of AOs and the number of qualifications that are on offer but the Federation believes that where there is confusion experienced by employers and learners this is more likely to be the result of the numerous government policy changes in this area in recent times. The City and Guilds report [Sense and Instability 2016](#) clearly outlines the volume of these changes.

We understand the need to be ambitious and drive forward with change, but the 2019 implementation date for the introduction of changes to technical education (in some routes) does not provide sufficient time to ensure the provision of a high-quality, well thought through qualifications. We are now well into April 2017 and we have not yet had sight of the occupational maps, the employer panels that will develop the standards within each route are not yet recruited, there is no clarity on the procurement process for the licensing arrangements and there is no clarity relating to the extent of the copyright that the Institute for Apprenticeships will wish to claim in relation to the qualifications within the 15 routes. We would urge the government to allow the Department for Education the time it needs to work with key stakeholders, such as the Federation, to develop an approach to technical education

that is ambitious but also well-considered. We believe that taking some time now, before launching the system, will increase the likelihood of the resulting system being fit for purpose, durable and better placed to contribute to the future economic success of the UK.

English, maths and Functional Skills

8. The Federation agrees that English and maths are important for learners and they should feature in technical education and apprenticeships. Reformed Functional Skills in maths and English should be available for learners who want to develop and demonstrate their skills in these subjects in a more applied context. Our hope is that the current reform of Functional Skills will ensure the focus on the applied context is retained and will guard against any attempt to make Functional Skills just an imitation of the GCSE content and approach. We further hope that the flexibility that is currently allowed in terms of the frequency of access to assessment for Functional Skills will be maintained.

Apprenticeships

9. Apprenticeships form an important part of the technical education system and the Federation is completely supportive of apprenticeships as a high-quality route for learners to 'earn and learn' in their chosen job role. We do, however, have a number of concerns about the reformed apprenticeships which we believe could act as a barrier to them contributing fully to the future economic success of the UK. Our key concerns are:
 - The quality of some of the assessment plans developed by some of the trailblazer groups and the impact these will have on the validity of assessment.
 - The lack of approved assessment organisations on the Register of Apprentice Assessment Organisations (RoAAO) for almost 50% of approved standards. We do not agree that it is acceptable to start an apprentice on a standard without there being a clear route to assessment at the end. It would not, quite rightly, be allowed to happen in an A-level setting and we believe apprentices deserve the same duty of care as academic learners. If we are to strive for parity between the two pathways then we cannot accept that learners on the technical pathway can be treated in ways that would not be acceptable for those on the alternate pathway.
 - There has been a proliferation of standards under the reformed apprenticeships and this has been recognised as an issue. The IfA has committed to a review of standards and this is welcomed. However, it is also likely to slow the progress of applications to join the RoAAO as 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.
 - The External Quality Assurance (EQA) arrangements for the new apprenticeships are critical to the success of apprenticeships moving forward. Unfortunately, there is a continued lack clarity in terms of how each of the 4 permitted models will be managed to

ensure they achieve the same standard of quality assurance. The quality assurance expertise of bodies that are stepping into this EQA role does not appear to be checked in any way and this raises a valid question about their understanding of how to fulfil the role effectively and provide the assurance that all apprentices should be able to rely upon.

The Federation believes that an overarching set of criteria needs to be put in place for all EQA providers to achieve and that the experience that Ofqual has gained through its development and enforcement of the General Conditions of Recognition may be a useful place to start with this.

Transition Year

10. There is not yet clarity about the Transition year and what it will/will not focus on. We believe the intention is that it is a flexible year which is tailored to the needs of the individual learner. 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. 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 technical route.

Further information

Further information and clarification can be obtained from Ailin O'Cathain, Head of Policy, ailin.ocathain@awarding.org.uk, telephone: 02037863171