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:

Postal Address:

> Strategic Funding Policy Team
> Bay G
> Department for Business, Innovation and Skills
> 2nd Floor
> 2 St Paul's Place
> Sheffield
> S1 2FJ

Email: FE.reform@bis.gsi.gov.uk

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)

Education for Engineering (E4E) is the body through which the engineering profession offers coordinated advice on education and skills policy to UK Government and the devolved Assemblies. It deals with all aspects of learning that underpin engineering. It is hosted by The Royal Academy of Engineering

with membership drawn from the professional engineering community including all 35 Professional Engineering Institutions, Engineering Council and EngineeringUK.

National Colleges

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

We welcome the proposal to establish National Colleges, but have some concerns about their remit and their ability to deliver their mission.

For example, at present, we know that some full time delivery is being built into their business plans. In terms of supporting SMEs, this makes sense in that it will (depending on suitable placement opportunities) provide work-ready graduates at Levels 4 and 5 and mitigate against the financial risks of taking on untested apprentices.

Full time provision means that students will probably move away from home. However, the £5 million put aside (in the first instance only) for maintenance awards would fund at most 1,500 students. Adequate funding and student accommodation must be in place to avoid potential students having opportunities limited by a form of 'geographical deprivation'. We note that the response to the consultation on extending FE Loans to Levels 4 and 5 (as opposed to HE loans and maintenance awards) is still outstanding. If full time delivery is part of the delivery model, we think it is essential that access to HE loans is made available.

In order to reach all employers it would also be desirable for National Colleges to operate on a hub and spokes model, linking with other providers across the regions. We understand that the National College for Advanced Manufacturing is already planning this approach. UK employers also operate across the four nations. We appreciate that responsibility for education is devolved but some thought might usefully be given to developing skills UK-wide.

A further point concerns the curriculum. While the apprentice Trailblazer programme has been embraced enthusiastically by many employers in the engineering community, and a precedent has been set for employer-led standards, the tone of this consultation seems to imply a top-down provider-led approach, consulting employers in some instances, rather than being led by them. This seems inconsistent.

Finally, consideration should be given to reference to professional body standards where relevant, as these are (at least in engineering) developed in consultation with industry.

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

The proposal to start delivery at Level 4 is likely to be problematic. We doubt that there will be the increasing pipeline of A Level Science, Technology, Engineering, and Mathematics students that is required to feed both the university sector and these colleges. This supply is likely to be further compromised by the decline in recruitment of Maths, Physics and Design & Technology teachers, with the DfE citing shortfalls of 12%, 33% and 66%

respectively in applications for training in 2014.[1] Despite the new government's manifesto pledge to boost recruitment of Math and Physics teachers by 17,500, E4E has concerns that the supply of appropriate people, with the pre-requisite degree-level qualifications, is simply not sufficient to fill the teaching vacancies. Without the right teachers, there will not be enough of the right young people studying the right subjects at Level 3, to enable them to progress to the Level 4 provision of the National Colleges.

While the consultation cites progression from UTCs as a possible source of entrants, this is unlikely to happen in sufficient numbers. The inability of UTCs to recruit and doubts about their size and financial viability, given the likely further constraints on 16-19 funding, render their continued existence in their present form somewhat questionable.

An essential prerequisite for success must therefore be to secure adequate Level 3 vocational provision from across the Further Education sector to feed into and develop the Level 4+ provision. The National Colleges must therefore be given a remit and resources to support Level 3 delivery regionally. We would also urge that existing provision is quantified and mapped.

As regards their operation, we are keen to see the collaboration and value for money where there is strong existing provision and facilities, for example the partnership with Bridgwater College and Lakes College in developing the National College for the nuclear industry, and the developing links between the HS2 college and HE providers with rail expertise.

Finally, the relationships between National Skills Academies presumably need to be defined.

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

We are pleased that the Advanced Manufacturing College will collaborate with the Aerospace sector. Additionally, the following engineering sectors would benefit from the boost of high level technical skills promised by a National College:
- Specialist Chemicals/Pharmaceutical/Genetic engineering
- Bioengineering/Medical engineering
- Automotive/Motorsport/Autonomous vehicles
- Climate change (incorporating disaster defence)/Geoengineering

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** ☐

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[1] http://www.telegraph.co.uk/education/educationnews/11258232/Schools-warned-over-looming-teacher-recruitment-crisis.html

Please explain your response:

We doubt that rebranding would address the cultural changes that are needed to foreground technical engineering. It is more important to focus on building demand and securing provision, than to be particularly concerned about the name.

In addition, the word 'professional' has specific meaning in some sectors, including engineering. Any rebranding of higher vocational education that includes the word 'professional' risks causing confusion and is likely to have unintended consequences.

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

Yes ☑   **No** ☐   **Don't know** ☐

Please explain your response:

There are indications that the emphasis placed on apprenticeships by the last two administrations is taking effect. It seems likely that this can be built on. Encouraging adults to understand the spectrum of practical learning, from simple one-off 'how to' sessions, to extended technical learning over a number of months/years is important. Any marketing of higher vocational education must use the right messaging and avoid worsening the academic – vocational divide.

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

An accessible publication which shows:
1. destinations data (which would need to be better tracked than at present, and at a national level)
2. salary premium for 'graduates' from these programmes
3. return on investment analysis for companies including SME exemplars

It would also be worth considering a promotional campaign to attract people from industry who would be excellent tutors at this level. The more of these people who are involved in delivery, more the individuals will be interested in studying. Perhaps the Teach Too programme could be embedded in the National College models, giving people the chance to become 'dual professionals', and adding teaching to their professional skills.

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

Firstly, there needs to be a simplification and equalisation of schools and FE funding. We know from our work with employers and FE colleges on apprenticeships that, because of the constraints under which FE colleges are working, provision is beginning to unravel. In particular there are critical staff shortages in FE.

In order for more people to study higher vocational education, there will need to be a significant increase in the number of people able to teach such subjects. Whether an individual is entering this training at the start of their career, or is upskilling/reskilling at a later stage, they will require teachers and tutors who are expert in the most modern techniques and equipment. If colleges and providers are not able to offer competitive

salaries to draw in industry experts, the provision at higher levels will not be good enough. Individuals will not want to study with providers who do not employ industrial experts, and the current environment is reducing their capability to maintain a highly skilled workforce of tutors.

For example, the Institution of Civil Engineers is involved with the Technician Apprenticeship Consortium, a group of civil engineering employers who have come together to source apprenticeship provision regionally. In the recent past, colleges with whom the ICE has been working have lost staff and have been downgraded by Ofsted. The ICE has had to change three previously strong providers, following college down-sizing and losses of key staff. Furthermore, when the ICE have put apprenticeship provision out to tender in certain regions, no adequate bids have been received.

While the establishment of National Colleges as centres of innovation and excellence will help make best use of scarce resource, there will need to be a pipeline of Level 2 and Level 3 provision at a local level feeding into the system. We feel the pipeline is currently insecure, in terms of giving young people and adults the right guidance and access to subjects which will open the door to high level vocational engineering education. To repeat a point we have made in numerous consultations over the last four years and reinforced in the Annual Report of Her Majesty's Chief Inspector of Education, Children's Services and Skills 2013/14 (Dec 2014, pp 10, 14, 23) something more must be done about the parlous state of schools' careers education in England.

Not only must young people be given the right advice, but adults already in the workforce need to be recruited onto high level vocational courses to improve and refresh their technical skills. In engineering, our workforce is ageing, but we should not rely on young people entering the sector at 18 or 21 to address the skills shortages. Those who already work in engineering, or who are on parallel careers which could lead to an engineering role, will need to constantly renew their skills, and also be encouraged to progress. The PEIs can help with this, promoting CPD to their members and registrants, and helping providers understand how new engineering technologies can be taught.

Not only does the current workforce need to keep its skills current, Tata did some research recently which highlighted how little time some professional engineers spent on actual engineering tasks. High level vocational education should also enable individuals to step back from their roles and assess how they use their technical skills. It should prepare individuals to play their full parts in their companies, and give them the skills to address their own underutilisation.

Part-time higher education provision

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

The increase in tuition fees resulted in some employers withdrawing from sponsoring their employees. The funding and fees for part-time provision need to be reviewed.

Another factor that prevents individuals accessing part-time HE (or FE) is the growth of the flexible labour market. Those who might most benefit from being upskilled are frequently working on zero hour contracts requiring 24/7 availability, or with rotating shift patterns, which render a commitment to regular attendance impossible. At that level, in technical

subjects, face to face teaching or interactive real time tuition is often required rather than open-learning and distance-learning.

E4E is also very much in favour of access to loans for individuals with equivalent qualifications, as we want these to be available to people who want to retrain in STEM subjects. These individuals are likely to want to access part-time provision, so that their career change can be managed without the necessity of a break from paid employment.

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 are wary of this and would prefer incentives for established providers, usually universities and awarding bodies operating at the HNC/HND level, to oversee this provision. Operating under licence from the Engineering Council, the Professional Engineering Institutions (PEIs) already accredit and approve provision at this level, ensuring that it is fit for purpose for industry as a whole and for progression to higher levels.

Our particular concerns are illustrated by Para 143 which suggests saving the cost and bureaucracy of complex validation arrangements, and empowering vocational providers to respond to local employers. The danger here is that public money would subsidise bespoke employer qualifications which would have no currency in the wider sector. This sort of training is better carried out on a purely commercial basis, as can happen at the moment.

Furthermore we would suggest that, in the current climate, no public body would be sufficiently funded to carry out and monitor this work competently. We note for example that the DfE recently received a qualified audit report. There would undoubtedly be a risk of fraud.

As a safeguard, we would expect awarding powers to apply for discrete and clearly defined occupational areas. We would be extremely concerned if, for example, a provider that received awarding powers on the basis of a good track record in business and law then branched out into a safety-critical industry, with no further scrutiny. We would add that such scrutiny may sometimes appear complex and burdensome, but it is necessary.

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

If it is decided to set up a new body, then the procedures to scrutinise providers and qualifications already exist through the professional engineering institutions' approval and accreditation processes. There is a common standard set by the Engineering Council (UK-SPEC) which forms the basis for this, and employer and academic members of the PEIs are involved in the process. The professional engineering community, through E4E, would

be happy to be involved in this, and particularly in helping government understand the demands on professional institutions in managing this process.

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

The role of National Colleges should be to support employers in developing standards and devising cutting edge programmes to reflect and deliver standards. At present, employers lead on apprenticeship development and this should remain the case. National Colleges should not define qualifications. Rather they should work across and with all stakeholders.

There is also a role in coordinating and supporting the pipeline form Level 2 and Level 3 at a regional level, and training and upskilling teaching staff, as suggested previously.

As regards curricula, Pearson (the awarding body for HNC and HND) consults regularly at a national level with employers, HE, FE, professional bodies, independent training providers, sector skills councils and trade associations. This works well, with new knowledge being incorporated into qualification frameworks as and when required. The qualifications are then approved by the professional bodies. We would hope that National Colleges would work with existing awarding bodies in this area to ensure consistency and access to progression routes beyond Level 4 and 5. We do not think they should be given awarding body powers, not least because this would be a significant transfer of cost from private sector awarding bodies (which work well) into the public sector.

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

Yes ☐   **No** ☑   **Don't know** ☐

Please explain your response:

See above for our reservations.

We would also need to be convinced that the appropriate systems and methodology are in place to identify high performing providers that are likely to remain high performing. Newcastle College (NCG) for example has not performed consistently, and others have experienced volatility in grading[2]

This suggests to us that both the instability of the sector renders the granting of awarding powers unsafe, and that the existing Ofsted inspection process is not sufficient to guarantee standards over a period of time.

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** ☐

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[2] http://feweek.co.uk/2015/05/11/the-rise-of-the-grade-three-provider-a-sector-wide-story/
http://feweek.co.uk/wp-content/uploads/2015/01/FEweek125-subscribers-.pdf
http://feweek.co.uk/2012/08/16/newcastle-college-boss-accusses-ofsted-of-flaws-in-their-good-inspection-grade/

Please explain your response:

The relationships the engineering community currently has with the awarding body for HNC and HND suites (and the provision delivered under licence in HE) is good. It enables a nationally agreed standard, which encompasses Wales and Northern Ireland, with provision mirrored by the SQA in Scotland. This level of consistency across the UK is helpful, is understood by employers, and should be maintained.

The HNC and HND suites have a variety of pathways, units and levels that are transferable and the awarding bodies are responsive to the development of new provision. There are strong relationships with the PEIs who approve these qualifications, and regular consultations as outlined in 11a (above). The PEI approval process secures the quality of the qualification.

Where local provision needs to be developed, new qualifications can be developed, an example being the collaboration between Stephenson College, BAM Nuttall (a major civil engineering contractor) and Pearson to develop qualifications for civil engineering surveyors, which are approved by the Chartered Institution of Civil Engineering Surveyors and the Institution of Civil Engineering, thus ensuring national recognition and contributing to the growth in Engineering Technicians.

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?

For engineering, this can be achieved by mapping the provision to professional standards embodied in the Engineering Council's UK-SPEC[3] This is currently being undertaken with Trailblazer apprenticeships and is part of the drive to establish a professional technician workforce. As part of the professional review to achieve these standards, candidates will have reflected on their professional development throughout their training, and this will be demonstrated in their application for review and the independent end-assessment of their apprenticeships. We recommend other occupational areas/sectors consider this approach, if they do not already have such a process.

Many FE and HE providers embed this work into non-apprenticeship HNC, HND and FD provision, and the engineering community is currently working with employers such as Balfour Beatty, and universities to embed Incorporated Engineer (IEng) registration into degree level apprenticeships.

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?

By building on the work above, the standards that employers recognise can be built in without difficulty. Trying to re-invent what already exists and is owned by the professional bodies and employers would be unnecessary duplication and would run the risk of forfeiting credibility with employers.

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[3] http://www.engc.org.uk/ukspec.aspx

Again, the engineering community would be happy to discuss and work with BIS and National Colleges to build on this. For example the Institution of Civil Engineers is already in early discussions with the HS2 College.

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:

If employers are not involved, as they are with HNC and HND qualifications, Foundation Degrees will not be fit for purpose and it is unlikely that they would be accredited by professional bodies. As such, graduates would have an unrecognised and value-less qualification.

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:

It is essential to tie in the ability to award FDs to areas where the provider has expertise, adequate facilities, the ability to deliver emerging technologies and ways of working (eg BIM - Building Information Modelling), and engagement with PEIs or other accrediting bodies.

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:

We cannot envisage how this might be achieved.

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

Through professional body approval and accreditation process as described above. Again, the Engineering Community, through E4E, would be happy to explore means of establishing joint processes. The 35 professional engineering institutions vary significantly in size and resource, so E4E could advise on the difficulties faced by smaller professional bodies, and mechanisms to enable them to play their part.

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:

While this is highly desirable, it is essential that exemptions can be provided for full time students wanting to retrain. For example, during times of economic recession, it is often impossible to find placements, but the need to maintain a pipeline of trained personnel is critical. There are providers, such as Group Training Associations, which have extensive facilities, and which can simulate some work-based environments satisfactorily, if true work-based learning is not possible.

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:

These were largely ineffective and the initiative was muddled and inconsistent in its development. A detailed analysis was carried out by ESRC [4]

In addition, constraints on staff time and capacity in FE meant that there was too little dissemination from CoVEs to other colleges. There may be an effective brokerage role that LEPs could provide to improve on this model. The TECs (Training Enterprise Councils) in the 1990s fulfilled this role reasonably successfully.

Finally, the initial introduction of the CoVE scheme was heavily criticised for failing to include providers outside the FE college system. It took significant representation from groups such as GTAs and employer-based providers to permit them to be included for consideration, and to level the playing field for CoVE status.

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:

It is hard to see what value this would add. This consultation suggests a model that is different from and far short of that of the polytechnics and CNAA. Unless the funding model is predicated on HE funding rather than FE funding, some stability for the provision may be hard to achieve.

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[4] Wahlberg, Madeleine (2007). What works, what matters? Evaluations of Centres of Vocational Excellence in FE: Full Research Report. ESRC End of Award Report, RES-000-22-1728. Swindon: ESRC available at http://webcache.googleusercontent.com/search?q=cache:vI5ShHnlAeQJ:https://www.esrc.ac.uk/my-esrc/grants/RES-000-22-1728/outputs/Download/cf1c5476-affc-4342-8709-f5a61ba8b78d+&cd=5&hl=en&ct=clnk&gl=uk

Current proposals also involve collaboration and devolved provision to FE colleges that also have to respond to local priorities, and have to be nimble in responding to a rapidly changing environment. A new status could easily be derailed by a major employer relocating or being taken over, and a college having to re-orientate its offer.

Another difficulty may arise from the natural cycle of demand. For example the HS2 college, after the initial start-up numbers, will have to find a sustainable business model for a future period of flattened demand.

Finally, those excellent providers which are not colleges would need to be able to qualify for such a special status, should one be introduced.

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

There is no alternative to adequate funding. Funding levels are currently inadequate and worsening. School sixth forms with poor success rates divert huge sums of money from FE, estimated by Policy Exchange and the Institute of Education at £300m per year on A Level non-completion alone.[5] This is unacceptable, not least because those students who then progress to FE to restart courses then have funding cut by 17.5% at 18+years. Funding may well also be dissipated by expansion of UTCs where at present all but 4 are currently operating significantly below capacity.[6] The relationship between UTCs, FE and National Colleges needs to be joined up in terms of curriculum and funding.

As regards pedagogy, a boost for TeachToo would pay dividends, and incentives for industry secondments would be advantageous.

The only way to enable FE providers to achieve excellence in vocational skills is through employer engagement, a fact acknowledged in the Perkins Review on Engineering Skills (2013). E4E has been working to implement the recommendations of this Review, particularly the elements relating to employer engagement in engineering education right across the spectrum. To do this, we have created effective and resonant business cases, for all those involved in the engagement. For the FE sector, the business case is actually a joint document, bringing together the business imperatives for both industry and FE, and expressing employer engagement as a way of achieving what both want. This information will soon be available through the National Forum for Engineering Centres (NFEC).

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?

In terms of collaboration between colleges and universities, the main barrier is a competitive funding environment that does not provide incentives for collaboration. Providing colleges with awarding powers may exacerbate this. Catapult centres could perhaps be given a defined role in driving collaboration as well as developing discrete

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[5] http://www.policyexchange.org.uk/publications/category/item/technical-matters-building-a-high-quality-technical-and-vocational-route-through-the-education-system?category_id=24 P5
[6] http://feweek.co.uk/2015/04/27/recruitment-at-14-difficult-as-utcs-capacity-runs-as-low-as-12-2pc/ FEWeek 27 April 2015, P.5

relationships with FE and HE providers. As E4E has found with its work on the Perkins Review, it is important that a compelling case for collaboration is made, that activity is supported and built upon to achieve an effective and sustainable relationship, and that everyone involved gets 'something' out of the activity.

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?

This can be achieved by specialist input into qualifications, with curricula designed to build on research and innovation from industry. We would not see this as direct provision of training.

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

Engineering Technician level skills, as specified by the Engineering Council and the PEIs, require a Level 3, rather than 4 or 5. Levels 4, 5 and 6 very much build on the initial base of knowledge and competence required for professional registration as EngTech. If National Colleges start at Level 4, it is essential that universities, colleges and catapult centres establish clear progression paths and routes up from Level 3 vocational provision. If National Colleges rely on A level entrants, the numbers will not be there. Practically, there also has to be a strategy to work with SMEs and local employers who may be unable to fund placements at National Colleges located elsewhere.

However the capacity of colleges to provide numbers is moreover likely to be seriously compromised over the course of the next 5 years with possible long-term and permanent loss of capacity, as happened in the recession of the early 1990s. We are concerned that a sector that is needed to drive skills will be unable to meet the challenge.

The growth of Trailblazer and degree level apprenticeships has been a positive step, together with accreditation of work-based learning. We welcome the emphasis and commitment given to funding apprenticeships. Lessons from these schemes might be directed at a more flexible scheme for upskilling the existing workforce. The Employer Ownership of Skills funding scheme was regarded by many employers as too inflexible, with too many strings attached.

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

As part of the accreditation process, PEIs examine and assess employer engagement in engineering courses at university. An accreditation panel will always include a person from industry, as well as academic experts. The panel will have a number of criteria and expectations in terms of employer involvement.

For example, they may insist on university departments having industrial advisory boards. Members of these boards work with departments to deliver real-life projects, develop curricula, provide placements, provide visiting lecturers, mentor students, supervise multi-disciplinary projects, organise site visits. Industry also sponsors research and funds chairs.

Significant input can also arise from major projects, for example Crossrail's support for the tunnelling academy and the specialist MSc programme at Warwick University, working with the British Tunnelling Society and the Institution of Civil Engineers.[7]

In addition, we recommend support for the development partnerships between SMEs and universities– many examples of uni-industry collaboration are prime-led and it can be difficult for SMEs to offer similar experiences due to lack of resources.

The impact of part-time students in employment bringing their own real-life projects into their programmes should not be under-estimated. They can add huge value across the provision of a subject, far beyond their own cohort.

Under the Perkins Review, E4E has been working with the National Council for Universities and Business, again creating a compelling case for employers, universities, and students to work together. This information will be released before the end of 2015, and should provide incentives and ideas for employer engagement.

Stronger virtual learning and use of technology

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

There are two threads to this, one being the use of new technologies to deliver teaching and learning, the other being the provision of new industrial technologies and ways of working for students to use as part of their programmes eg Building Information Modelling (BIM). As regards the former, most FE colleges will have VLEs which are used effectively to promote learning, but constraints on lecturer time will sometimes slow down adoption. Allowing FE colleges to bid to develop and pilot materials, for example working with catapult centres and employers, would be a cost effective way of incentivising adoption.

As part of the work on Perkins, we encountered some innovative uses of technology to share learning. Eg one large company live streamed its lunchtime seminars for its graduate trainees to a local college as well, using an inexpensive camera and web streaming technology.

As regards new industrial technologies, then adoption will be a matter of college departments procuring systems and training to meet industry standards. In times of financial constraint, new equipment and training budgets are usually cut. Again making funding available, subject to suitable bids, would reward strong providers with good industry links.

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?

There has to be a move towards devolving accountability to the local level with an acknowledgement that national frameworks for accountability, for example as inspection focus on NSRTs (National Success Rate Tables) may be too blunt an instrument. The

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[7] http://www.crossrail.co.uk/careers/tuca
http://www2.warwick.ac.uk/fac/sci/eng/study/pg/degree/msc/tus/

devolving of powers to the Greater Manchester Combined Authority (GMCA) which includes support for business growth and skills, seems to be a useful way forward, and we welcome proposals to expand this approach. However, care must be taken that the skills sector does not find itself working with conflicting priorities resulting from an inflexible inspection regime.

We are also concerned that Ofsted do not pay adequate attention to value for money in its judgements. The level of funding for the skills sector is not at the same level as schools and the latest inspection framework does not give adequate guidance on this. Local accountability would be greatly enhanced by devolving powers to combined authorities to oversee all post 16 provision.

There also has to be a recognition of the important role FE plays with those vulnerable learners who may never be able to enter full time employment, yet who can be helped to move towards independent living, often in small incremental steps over some years.

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?

We would support this, provided the selection criteria for the partnership/lead provider was rigorous and transparent.

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

- Provision may be awarded on the basis of historic relationships rather than merit.
- Contracts would also need to be of sufficient length to ensure viability.
- Local partnerships must have in place contingency plans to transfer learners from providers who go out of business.

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

Unfortunately we do not believe this can be done. High stakes performance measures and inspection result in perverse incentives, and in times of financial constraint, providers would be remiss in not maximising funding.

For example the NSRTs do not differentiate between short, medium and long qualifications. In a recent LSECT webinar on NRSTs, participants were interested in the potential to put on more short courses, with better retention and achievement rates, in order to boost success rates.

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

We would want to see definite proposals before commenting. The value of qualifications is in their portability for the individual, and in their recognition by employers in recruitment. While programmes of study may be more coherent, and develop the 'whole employee', the technical requirements of most engineering roles mean qualifications are valued.

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?

At some point there will be incidences of fraud, and sub-standard provision, with providers entering the market for profit rather than the 'mission' as in the recent A4e case.[8] This is not likely to be an issue at the testing phase but will certainly be an issue at some point. The department needs to have in place robust audit procedures in place for providers, with those commissioning the provision carrying out unannounced spot-checks for example, as happened with franchised provision. Sustainability of provision and providers' financial resilience need to be considered.

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?

The negative rhetoric directed at the unemployed and disadvantaged learners, together with a regime of punitive sanctions, sits uneasily with notions of 'support' for these learners. While this persists, many learners will continue to resent 'support'. It is culture that needs to change rather than approaches. For example learners might be rewarded for attending training by provision of adequate financial support for travel to training and work experience, and free access to DBS checks, safety cards etc.

Also, we recommend bringing employers and charities into the process at an early stage, to ensure that such learners are more likely to find employment at the end of such courses because employers are aware of them. Many third sector organisations, such as the Prince's Trust programmes, have successfully placed disadvantaged young people into employment, and are experienced in addressing the challenges inherent in supporting these learners. Also, part of this process needs to include helping such learners develop employability skills, preparing for interviews etc, especially where specific issues such as lack of confidence may prove a barrier to employment even once a qualification is gained.

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?

Para 208 suggests guidelines, whereas this question seems to suggest a more prescriptive approach. The channels that remain for disseminating good practice would probably be through the AoC, AELPs and LEPs.

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

This is something that has worked well in the past when TECs worked with local authorities, colleges, the voluntary sector and independent training providers.

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

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[8] http://www.bbc.co.uk/news/uk-england-32139244

The structures that existed to support these partnerships no longer exist, and they cannot be replicated without cost. Sustainability is therefore a risk.

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?

We have no comment.

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

We have no comment.

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

We have no comment.

Supporting the development of resilience in the sector

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

While schools retain students on unsuitable courses, FE will continue to be inadequately funded for those students who enter at 18+yrs. In STEM subjects, the aspiration to deliver at level 4 will be constrained by the lack of STEM Level 3 in schools. While numbers taking A Levels in Maths and Physics have risen in recent years, these are students who are more likely to enter HE. To get the higher technician skills required for the economy, we need strong Level 2 and Level 3 vocational provision. This cannot be delivered by schools, and urgent attention to careers guidance remains an issue.

Specialism by colleges is also not necessarily an answer to skills needs. While National Colleges potentially have a key role, local economies require a range of skills across a broad range of industries. FE should be responding to these.

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

One obvious lesson is that colleges situated near major employers have a significant advantage in focussing their provision and are able to develop specialisms which are sustainable. Others serving predominantly SMEs will have difficulty identifying specialisms that will provide a sustainable supply of learners

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

Relationships with LEPs and other regional authorities will be crucial. Again we support devolution along the model planned for Greater Manchester.

It should be noted that since the demise of the RDAs, some providers state that they have been unable to access the same quality of LMI as in the past. Without high quality Labour Market Information, providers are reliant on local employers articulating their needs in a timeframe which enables appropriate investment in equipment and skilled tutors.

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

.Para 227 notes the difficulties in steering autonomous college corporations and speaks of intervention to protect learners and public money where necessary. This is reactive rather than proactive and we would question the efficacy of this approach in the efficient provision of skills across the UK, not least because it has patently failed to deliver the engineering skills required in the economy since incorporation in 1993.

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:

We note the DfE's recent qualified audit. This does not suggest confidence in the monitoring of value for money in 16-19 schools environment and its knock-on effect to FE. We would urge a stronger role for BIS in this area in planning the environment, particularly looking at the viability of sixth forms, and the under-capacity in UTCs. Rationalisation should not be restricted to FE colleges.

For example the Royal Academy of Engineering's Engineering Talent project has done some preliminary research on how to address skills shortages in engineering. It suggests that even if girls behaved like boys, and even if we opened the 'pipeline' by 20% at every level, we still wouldn't be able to meet predicted engineering skills shortages – therefore we all need to do more to protect and preserve our current workforce (ie adults in the engineering workforce, plus those who would be appropriate to retrain). This suggests an urgent need for a more interventionist approach to support new entrants, retain existing skills and/or upskill current workers.

Disadvantages:

Without tackling the inequities in funding and the inefficiencies in the schools sector, we find it hard to envisage a successful future for a sector that is vital in driving the skills agenda.

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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