

**Department for Education Consultation:
Higher Technical Education**
**Response from the Chartered Association of
Business Schools**

27 September 2019

The original consultation documents are available at:

<https://consult.education.gov.uk/higher-technical-level-4-5-review-team/higher-technical-education/>

The Chartered Association of Business Schools is pleased to submit a response to the Department for Education's consultation on its proposed reforms to Higher Technical Education in England. Many of our member business schools are already active in providing Higher Technical Qualifications and share the DfE's view that we need a simplified system that delivers high quality qualifications relevant to the labour market.

To ensure that the reforms don't lead to further complexity, it is crucial that views are sought from a wide range of stakeholders, including employers, students, parents and education providers. The Chartered ABS is happy to work with the DfE to provide the perspective of UK business schools. In this document we have outlined our most important questions and comments on the proposals made by the DfE.

The demand for more higher technical qualifications

It is clear from this review that the Government feels there is a need to encourage more students to undertake higher level qualifications that fall short of a degree. Whilst there is evidence of low numbers, the evidence for need is less clear. It is hoped that the views of students and parents will be heard by this consultation and certainly before any policy is derived.

The experience of our members is that students who qualify to level 4 or level 5, but not at degree level, is a result of wanting or having to pull out of a full degree programme before completion. The original desire is to obtain the degree, but for those who, for whatever reason, are unable to complete their degree, universities quite rightly give recognition for their achievements. Any policy aiming to increase the number of level 4 and level 5 qualifications should not result in preventing students from aspiring to and setting out on a degree programme.

The document refers to developing the '*skills, knowledge and behaviours*' for an occupation thereby implying that applicants for these courses will have settled on an occupational choice. This may be true of the more mature student but for the traditional 18 year old they would need reassurances that the qualifications have value outside of the immediate occupation if they have not finally committed to this as a 'lifelong' career. If this is not addressed the qualifications are unlikely to appeal to the younger applicant.

The need for more higher technical qualifications

The other perspective that needs to be considered is the employer. There is already a plethora of qualifications available at all levels. As above, students may leave university with a level 4 or level 5 qualification and be considered perfectly well trained to enter a particular job role. There are also numerous professional qualifications at below degree level (and in business and management these can form part of a full degree programme) that are already scrutinised by professional and educational bodies.

An example is financial advisers: there is a regulatory requirement for financial advisers to be qualified to level 4. This is the requirement of the Financial Conduct Authority; the regulator. It should not be the role of the Institute for Apprenticeships and Technical Education to decide what should and should not be included in these qualifications, rather it is the regulatory body's responsibility. Furthermore, such qualifications are already regulated by Ofqual.

Implications for providers

If specialist facilities are a condition to be designated as a 'quality provider' this will concentrate the provision in those providers choosing to specialise in this provision and limit the extent for other

providers to realistically compete. It might be that a blended approach is needed with certain technical qualifications being delivered in specialist locations (such as Institutes of Technology) and others in more 'broad portfolio' providers (such as HEs). However, there is then the potential for an 'elitism' to emerge in the technical qualification landscape which may be an unintended consequence of such an approach. It may also limit access to specialist providers due to geographical constraints.

Training versus teaching

The consultation document interchangeably refers to 'training' and 'teaching' as if they are one and the same thing. This doesn't reflect the reality of how content and delivery are blended to achieve specific learning outcomes. If this is not clarified providers will be unclear as to the skills required by their educators, thus making it difficult to provide quality provision.

Are these qualifications purely about training for an occupation (in which case why are they not solely located in industry?) or a blend of training and education? This distinction is crucial to developing appropriate courses, benchmarks, expected connections with industry, and the development of staff with the skills to deliver the learning. The document also seems to suggest that students could interchange between taught elements and apprenticeships, which indicates a lack of clarity regarding the exact nature of these qualifications.

Accounting for varying learning styles

Learning styles are very different between apprenticeships (work based learning) and more traditional learning styles. Flexibility is referred to in the document but not explained and the target demographic of students for these qualifications may be less prepared to cope with flexibility, particularly in the early stages of study. We recommend that substantial planning is invested in ensuring that students are prepared for and supported through potential transition points where progression and performance are likely to be at risk. It should also be noted that if drop-out rates were high this would cause a problem for providers on key OfS metrics.

The ambition of the Institute for Apprenticeships and Technical Education (IfATE)

We believe it is crucial to avoid mission creep which could cause unnecessary complexity and confusion. Universities have been awarding level 4 and 5 qualifications without a problem for decades, so there is no need to change this part of the system. The question would have to be, why re-invent the wheel? Or indeed, why add an additional wheel that is potentially pointing in a different direction? This would only become an issue if, as is heavily hinted, there are funding implications associated with this.

There may be arguments for additional lower level qualifications, but that is not clear from the evidence. All the evidence shows is that there are relatively fewer such qualifications. Above all, these qualifications should not prevent students from using these as a stepping stone to a degree and certainly should not become the 'poor student's' equivalent of a degree. Any suggestion that the intellectual property of such programmes could be taken over by the DfE will immediately rule out the participation of universities, as would any arrangement which placed employers in charge of assessments. It is the opinion of our members that this proposal needs some serious reconsideration.

Finally, there is no reference to how current HE provision is already delivering some of these aims, particularly in business schools who have a long tradition of working creatively with employers to provide meaningful employer focused learning experiences for students whilst at the same time

broadening students' horizons beyond previously imagined possibilities. This has enabled business school graduates to succeed in a global working environment. Rather than implying that we are starting from scratch, it should be acknowledged that solid foundations already exist and can be built on to genuinely transform the educational offer, choice and professional development of students.

About the Chartered ABS

The Chartered ABS is the voice of the UK's business and management education sector and our members consist of 121 business schools and higher education providers across the UK, as well as affiliate stakeholders, corporate members and international partners.

The UK's business and management education sector represents 1 in 5 university students and contributes £3.25bn to the UK economy. Its management students go on to lead global businesses and its entrepreneurs contribute to our dynamic economy. Its research has an impact across society and helps to turn our capacity for invention into viable businesses.

While MBAs may enjoy the highest profile of all business school programmes, they make up a very small proportion of what business schools do. In terms of student numbers, MBAs make up less than 5% of the over 325,000 students studying in business schools in the UK, and this doesn't take in to account short programmes, often offered under the umbrella of Executive Education, which caters for an increasing number of open and bespoke programmes delivered to employees in both large and small firms.