September 2019

Department for Education consultation on Improving higher technical education

Supplementary written response on behalf of the Engineering Professors' Council

The Engineering Professors' Council (EPC) represents the academic engineers in the UK, with 85 university engineering faculties as members comprising over 7,500 academic staff.

Our primary purpose is to provide an influential voice and authoritative conduit through which engineering departments' interests can be represented to key audiences such as funders, influencers, employers, professional bodies and government. All branches of engineering are represented within the EPC's membership.

The EPC has contributed to and supports the detailed responses to the consultation questions laid out in the Education for Engineering submission to the DfE consultation on Higher Technical Education.

We would additionally like to draw attention to a number of key points and some of the assumptions on which the proposals are founded.

1. The need to expand Levels 4 and 5 qualifications

The recent reform of Level 4 and 5 apprenticeships, to provide an employer-led technical route to Level 4 and 5 has not substantially increased the numbers embarking on such technical routes and anticipated demand is far from met. It does not follow logically that the absence of level 4 and 5 qualifications means the levels between 3 and 6 are underused. Indeed, the absence of demand among students or employers for qualifications at these levels suggests that – like AS levels – they are commonly regarded as no more than staging posts between more significant milestones.

Nonetheless, with 26% of people aged 16-24 with L3 as their highest qualification and low numbers starting L4/5, there is indeed an urgent need to establish the fundamental reasons and barriers for them not progressing further. HTQs will make a valuable contribution to this shortfall – and consequents skills shortfalls, particularly in engineering – if and only if they are led by demand by employers and students, rather than by supply on the part of providers and Government.

2. Building on what works

Although we support the expansion of Apprenticeships, they remain an unproven model at 4 and 5. The "common framework of employer-led occupational standards" has not yet been rolled out and T Levels do not even exist yet. There is not yet an IoT in every major city in England and no one has any knowledge of the IoT assessment process on which the quality framework in these proposals is based. These are not tried and tested approaches.

Why try to create a different framework and structure when one already exists in the form of higher education exit awards? Level 6 degrees (and, in the context of engineering, Level 7 too) are well established and respected by students, employers and the Professional Engineering Institutions alike. Rather than trying to build up prestige for HTQs by modelling them on pathways that are still trying to establish themselves, it makes more sense to adopt the reflected sheen of qualifications that have long been acknowledged as a

gold standard. To this end, the EPC wholeheartedly supports the proposal in the Augar Review that Level 6 qualifications should have 'jump-off' points at Levels 4 and 5.

It is true, however, that, since most university degrees are not developed with the concept of intermediate Level 4 and 5 qualifications in mind, there would need to be a process to agree what learning falls into those Levels, so that it can be rigorously assessed. This would allow student to transfer qualifications between institutions and, if they so wish, return to education throughout their lives to top up their skills as needed.

As well as reducing the cost and complexity of developing HTQs that diverge more radically from existing higher-level qualifications, this also provides a mechanism for faster introduction based on supporting the expansion of existing infrastructure and proven excellence of provision.

As we understand it, the only reason to object to this is the out-dated notion that the university pathway is somehow non-technical. This may be true for some disciplines, but that may be because those disciplines themselves are inherently less technical. It is not true for Engineering, which is taught in universities on an accredited basis, often using project work, placements, work-related learning, industrial partnerships and according to rigorous and well regulated standards.

Another advantage of expanding Level 4 and 5 qualifications based on the existing provision in HE providers is that innovation in provision is driven by competition for students and the desire to ensure positive employment outcomes. Alongside institutional autonomy, this allows providers to develop effective models that meet changing needs. This is unlikely to be possible within a framework more tightly modelled around Standards structures that will take time to develop, approve and modify.

3. Alignment with the Augar Review recommendations

While these proposals are reliant on the adoption of the Post-18 Review's recommendations around additional capital funding for HTE provision in FE colleges, there is little evidence of joined-up thinking between this consultation and the detailed recommendations in the Augar Review. The EPC would like to see what alternative proposals the Department has should the recommendations from the Augar Review not be implemented, particularly any proposals that may require and not receive approval through primary legislation.

4. Quality metrics

The proposed quality metrics are input-based and it is suggested that OfS would be responsible for monitoring these. Currently, OfS models of measurement tend to be outcome-based. We agree that outcome-based measurement is narrow and data needs better contextualisation, however, it does not make sense that, at Levels 4 and 5, quality should be based on input, but on output at Level 6. We would suggest harmonisation of the measures around metrics and other methodologies that assess learning gain.

5. Theory of change

The consultation document demonstrates a substantial amount of consideration has gone into the detailed development of plans. However, at the heart of these proposals is the presumption that if enough time, money and effort is spent on developing a complex, highly regulated, employer-led framework that accommodates diverse stakeholder needs and draws on employer contributions (that will compete with their contributions to the provision of work experience, apprenticeships and placements), then students and employers will start to want to embark on qualifications that for which they have not previously expressed significant demand. Employers will also recognise those qualifications as sufficiently competitive with degrees to be worth supporting and using as a recruitment channel.

What we do not see in the proposals is an intrinsic theory of change or any evidence-based approach that explains why HTQs as conceived would offer clearer, better or even significantly different progression pathways.