

INDEPENDENT HIGHER EDUCATION

IHE response to the IfATE consultation on
strengthening technical qualifications at levels
4 to 6

April 2024

IHE welcomes the introduction of further categories of qualifications, which will expand the opportunities for providers to gain recognition for their qualifications and positively support student choice. Many IHE members offer, or have the potential to offer, qualifications in the technical and skills space which meet student and industry demand and have regrettably been restricted from gaining recognition and funding for these in the current HTQ model. As such, the broader definitions of technical qualifications proposed here is a welcome development, and IHE urges IfATE to ensure that the new model maximises the potential of the small and specialist institutions poised to make a significant contribution to the advancement of technical education.

Our response particularly highlights how the current occupational maps are a barrier to the development of innovative, industry-focused technical qualifications that appeal to a diverse body of learners. As these are determined by SOC codes, which themselves are reviewed every decade, the occupations and maps available are rapidly outdated. Categories 2, 3, and 4 are therefore a welcome development which, with the right parameters, offer opportunities to our members.

We do however also highlight that recognition needs to be given to the resource and funding required to develop new qualifications, and to this end are calling for equivalent funding to that provided under the Modular Acceleration Programme for providers on the RQF from 2025.

We are also compelled to note the risks in the new approach proposed by IfATE, and more broadly the opening up of funding for technical qualifications. In the majority of cases it will be awarding bodies, not providers, who will be submitting qualifications for approval. Experience with HTQs has shown that awarding bodies are reluctant to do this, thus posing a barrier to providers in gaining recognition and funding for their qualifications. Secondly, there is a risk that the current distance between providers and awarding bodies will result in qualifications with

commercial motivations without working sufficiently in partnership with providers to ensure that they are both deliverable and in the student interest. As it is providers who are ultimately accountable for the delivery of qualifications, and the student experience and outcomes, it is critical that they have a role in determining whether qualifications are approved under the IfATE framework.

To this end, we propose in our response that there is a 'provider test' as part of the approval process, and mechanisms built in for providers to report if approved qualifications are no longer working for them, or their students. Without this, there is a risk of qualifications entering the market for which the quality cannot be assured – risking the reputation of both the provider, and the technical education sector. Although beyond the scope of this consultation, IHE is calling for technical awarding powers for providers, to address this fundamental flaw in the system as it currently stands.

A key strand of our response, and reflecting the priorities of the members we represent, is the issue of student choice and equality of opportunity. We welcome in particular the recognition of smaller, specialist qualifications and those which will enable students to change pathways, reskill, or try out an area of learning. This is critical in meeting the needs of diverse learners, especially those from underrepresented groups. As part of this, we are also calling on IfATE to consider how to make the most of the opportunity this new model presents to create more joined-up learning pathways. Specifically, we would like to see mechanisms for students to move between apprenticeship and standard qualification routes.

Category 1 - Professional Technical Qualifications:

Question 1: Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence by aligning to an occupational standard at level 6?

Yes.

IHE welcomes the introduction of a process to extend student finance to a greater range of qualifications across the RQF. This will expand the opportunities for providers to gain recognition for their qualifications and positively support student choice.

As noted in our response to the earlier consultation on the introduction of HTQs, many IHE members offer or have the potential to offer qualifications in the technical and skills space which have previously been restricted from gaining recognition under regulation and funding, as they did not fully align to existing occupational maps. As such, the broader definitions of technical qualifications proposed here, and the more flexible use of occupational maps, is a welcome development.

We agree with the creation of a process to recognise technical qualifications at level 6, and the category as defined. It is important for meeting clear employer and industry needs by equipping learners with higher-level skills to build on those gained at level 4 and 5 HTQs, which are currently only met through funding a degree or Degree Apprenticeship.

We do have concerns that the proposed tests for all four categories do not include the teaching provider perspective. Qualifications on the RQF are delivered by awarding bodies, and these bodies are not required to be regulated by the Office for Students (OfS) unless they are also

delivering these qualifications. As it is providers who will be regulated and will have to meet regulatory requirements to ensure courses are up-to-date, provide educational challenge, are coherent, and require students to develop relevant skills (see condition B1 in the OfS regulatory framework) amongst other academic quality regulations, it is imperative that they also test the suitability of qualifications to be funded, and thus regulated as higher education provision. This would provide some assurances that the qualification has been considered suitable for delivery under the proposed regulation for providers of Lifelong Learning Entitlement (LLE) funded provision.

Question 2: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

We would suggest that the Employer Demand Test is reframed as an Industry Demand Test – to recognise the significance of freelance professionals, and the broader workplace application of this level of study. This is particularly important in some sectors, including the creative industries where there is a growing market for technical and skills qualifications. This would also be useful for categories 2-4.

Category 2 - Additional Specialist Technical Qualifications:

Question 3: Do you agree that IfATE should define a category of qualifications for approval that deliver additional specialist competence by building on occupational standards at levels 4, 5 and 6?

Yes.

IHE welcomes and notes the importance of this category in the flexibility and opportunities it could provide for both students and industry. This category will enable the development of qualifications that meet emerging skills needs and respond to changes in industry, as well as meet student demand. This will support the development of new provision and promote student choice.

We are also particularly supportive of this category's recognition of smaller qualifications at 30 to 60 credits. Many IHE members already offer smaller specialist training and qualifications to build on existing occupations, which could gain recognition and funding under this category.

There are numerous examples amongst our membership of where this could be of value. Providers offering hair and beauty training could build on existing qualifications to enable employees to develop skills in new methods and techniques, or to work in specific industry environments such as fashion or film. Culinary schools have scope to develop modules which go beyond the core skills currently covered in occupational maps, to provide more culturally diverse qualifications, or to add skills for different workplace environments, such as recipe development for large-scale culinary production or management of online meal companies.

There is also clear evidence of the need for this category of qualification in rapidly evolving areas including technology and data science, creative media, science, and manufacturing. The creation of smaller specialist qualifications will enable individuals to upskill in their industries and roles without needing to take on a whole larger qualification.

This also supports reaching a wider pool of students than currently done so by the HTQ model. These qualifications will appeal to those with existing qualifications or career experience seeking to upskill and progress - or retrain and change their career path. Many IHE member institutions recruit these types of learners already and welcome the opportunity that this category presents to provide funded qualifications for this group.

Question 4: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

This category provides much needed opportunities for upskilling and re-skilling those within an occupation, as mentioned in our response to the previous question. For this reason, we strongly urge IfATE to consider a clear pathway for qualifications which do not align to existing occupational maps but offer specialist provision of between 30-60 credits. For LLE to ensure that skills provision can remain current, flexible, and meet the needs of industry, the specialist offer cannot be limited to existing occupational maps, which by their nature reflect the previous 10 years of an occupation, not the future. It is essential that qualifications can be developed and funded to ensure that the workforce can upskill when required to meet the emerging needs of industry.

The impact of emerging fields such as data science, AI, and sustainability are excellent examples of this need. The impact of these emerging disruptive forces on existing occupations is not yet mapped, but already IHE members are responding to industry demand for these skills within specialist provision such as laboratory science, food and nutrition, construction, conservation, and creative industries. If these qualifications cannot be authorised for student-led funding, then only students (or their employers) with private funding can upskill, creating inequality of access and narrowing the workforce who can work at the forefront of these emerging trends within their industry.

One of the ways IHE members might use this category is to create further pathways for students undertaking apprenticeships, and so it is important that the new model facilitates this. This category could enable students exiting an apprenticeship, due to a change in role or desired change in employer, to continue their learning and career progression by undertaking specialist modules to either move to another apprenticeship or complete their qualification with modules more aligned to their new more specialist role. This is especially important in certain industries, such as the creative and tech industries, where jobs evolve rapidly. This can lead to higher drop-out rates for apprentices for whom their role is no longer a good fit or in line with their career aspirations. This new model of technical qualifications has the potential to create routes for these students, supporting retention and career progression, and ensuring that students can obtain a qualification despite a change to their apprenticeship journey.

This category also offers options for apprentices or technical education learners undertaking a level 4 or 5 qualification to take additional specialist modules at the end of their current studies, funded through LLE, to allow them to specialise further or as a bridge to further learning including a higher-level qualification. This will be particularly important to support the ambition of LLE that students are enabled to carry credits between qualifications on the RQF and those on the FHEQ. Specialist modules can facilitate sideways progression through common specialisms such as user experience and customer experience, two of the most commonly required skills across all industries identified in major skills analysis.

It is for this reason that we also encourage the development of a teaching 'provider test' across all categories. This is essential to ensure the qualifications approved can be delivered in the diversity of environments which will be eligible for student funding from 2025. We expect they will be regulated alongside and in a similar way to modular delivery, due to their anticipated lower credit value. The qualifications must be able to match the deliverability and student support models developed for modular delivery, which has primarily been delivered by providers who award and teach their qualifications. This means the prevailing model of regulation is rooted in qualifications designed by those who will deliver them - a very different model than the qualifications which will come to IfATE for approval.

Question 5: Do you agree that IfATE should allow approval of additional specialist qualifications that build on a standard at the level directly below the qualification level? (if yes, please provide details of any areas in which you see this as a particular need)

Yes.

IHE supports this intention as it both enables qualifications which are progression routes from qualifications at lower levels on the occupational maps, and also contributes to addressing the issue we have noted already - that the current maps are restrictive, and do not support the full range of qualifications which our members offer or have the potential to offer. Our members work closely with their industries to develop short qualifications which can get people into work more quickly.

Examples include qualifications in the culinary industry, which are becoming increasingly specialist. Industry roles in recipe development, food marketing, nutrition, and wellbeing are in high demand, and IHE members are already offering this specialisation to their students, drawing from expertise in aligned industries and from their industry itself. These qualifications can be delivered against level 4 and level 5 qualification standards, depending on the occupational map drawn on, but are aligned to allow the development of specialist skills from existing occupational maps within catering and hospitality.

Another example from STEM is the development of specialist qualifications in testing, inspection, and certification. One of the most rapidly growing industries in Europe, roles in this field build on existing expertise within an industry, and require specialist technical knowledge in testing, inspection, and certification, which are often at a level above. They build on the existing knowledge and skills within the industry, applying specific skills to meet the needs of regulation within that industry.

Further examples include qualifications in the creative industries, where occupational maps are often broad and specialism is required by specific industries. The British Academy of Jewellery offers qualifications up to level 6 in jewellery design and production, offering specialist training which builds on the existing occupational maps at level 3. This includes areas like gemmology and diamond grading, essential for anyone stepping into a managerial role or a sole trader role within jewellery design or allied trades.

Category 3 - Occupational Progression Technical Qualifications:

Question 6: Do you agree that IfATE should define a category of qualifications for approval that deliver cross functional and/or progression competence by selectively covering outcomes from one or more occupational standards at levels 4, 5 and 6?

Yes.

IHE welcomes the introduction of this category, and the opportunities this now presents for its members. Many small and specialist providers have been unable to gain recognition for their qualifications through the HTQ route, due to the requirement that qualifications align fully or address every element of an occupational standard. IHE raised this as a significant concern and welcomes that this has been addressed.

We feel that the current occupational standards are limited and too restrictive. Just some examples of existing qualifications offered by our membership which are not (yet) addressed by the existing standards are: qualifications in garden design (which have elements of, but do not fully address, the horticulture occupational map); and qualifications in adult education training and coaching (these could have elements of standards across education and human resources).

We strongly support a multidisciplinary approach and developing cross-functional skills: this is what roles across all sectors increasingly will require. In the creative industries, current and future professionals will need to have a blend of creative, technical, and business oriented skills. In tech, science and manufacturing the picture is similar: technicians, developers, engineers, and designers will be required to be both technically competent and effectively manage people and services.

Many IHE members are already offering, or have the potential to offer, multidisciplinary qualifications which would fit into this category. Sassoon Academy offers training for senior hairdressing staff to become educators or salon managers alongside hairdressing; culinary schools teach business and food and nutrition education as part of a suite of culinary courses; UCFB combines sports coaching with management, education, and media. These are just a selection of examples which demonstrate how specialist providers are perfectly positioned to respond to industry need and student demand, by developing multidisciplinary qualifications which reflect what the future of work looks like.

Question 7: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

One use of this category for IHE members will be to create additional pathways and flexibility for students undertaking apprenticeships, who wish to step off their apprenticeship but continue their learning and complete their qualification. Under this category, teaching providers would be able to offer qualifications which enable apprentices to continue their learning within their industry but take advantage of a more interdisciplinary approach. Examples of this include evolving industries such as digital and technology, where occupational progression is less linear, or the sport industry, where careers can progress across roles within an occupation level (community coach to high performance coach), as well as progressing to higher-level occupations (high performance coach to routes in sport events, psychology, nutrition, education, or analyst). IHE would like IfATE to consider how to maximise the opportunities this

new model presents to create more student-centred and joined up routes to qualifications that can also meet student expectations for outcomes within their industry.

The Significant Outcomes Approval Test will require the demonstration of the occupation specific competencies gained through a qualification. This may be challenging to demonstrate where qualifications are delivered across an industry, and where workplaces may look very different. The test is currently applied to levels 2 and 3, which primarily do not use a model where career progression is implied. To support qualification awarding bodies and those working with them to submit information that is relevant, without undue burden, further guidance from IfATE will be needed.

Category 4 - Employer Proposed Technical Qualifications:

Question 8: Do you agree that IfATE should define a category of qualifications for approval that deliver occupational entry competence against an occupation at levels 4, 5 and 6 where no occupational standard exists?

Yes.

IHE welcomes the intention of this category to support innovation and growth across industries, enabling the development of qualifications for roles for which there are no standards for occupations recognised on existing occupational maps. We encourage IfATE to go a step further, and also consider qualifications where there is strong industry demand for a new occupational map, and look to streamline processes to avoid the lengthy delays associated with the creation of new maps. This will enable teaching providers and awarding bodies to be responsive to current and future industry needs and student demand. Student demand is particularly important to consider as these qualifications will be funded primarily by students through the student loan system.

The ability of IfATE to approve qualifications in the absence of a standard is important, as the evolution of skills requirements within many industries far outpaces the natural process for mapping occupations and producing standards. IHE members developing apprenticeships in skills shortage areas including information technology, creative design media, and environmental sustainability specialisms note that the existing processes for developing occupational standards are quickly outpaced by the rate of change within the industry, and in some cases can contribute to the drop-out rate of apprentices, who move to new roles that do not yet have a standard.

Category 4 also enables awarding bodies working closely with industries where there is a dominance of SMEs, sole-traders, and freelance professionals to submit qualifications which meet their needs in the absence of employer developed standards. Again, this is particularly evident in creative industries where individuals naturally drive innovation and practice. An example from our members is the evolution of the garden designer occupation, which remains without a standard but is a well-established occupation within the larger fields of horticulture, architecture, and design. It is recognised by the RHS as an occupation, and their case study to encourage people to take up the occupation is a self-employed individual. Despite recognition by RHS, a professional society (Society of Garden Designers), and qualifications developed outside of the technical education space, no trailblazer group has been established. IHE members note the absence of larger employers as one of the reasons this qualification remains

without a standard, despite being delivered across professional training and degree level education.

Question 9: Are there any other elements IfATE should consider when specifying this category, to ensure it delivers its stated intention?

Alongside the benefits of a more open and flexible approach, there are also more risks for teaching providers and students in developing qualifications without a standard – although we reiterate that we believe this category critical to the success of LLE to meet emerging skills needs. We again call for a dedicated role for teaching providers in the approval process. Teaching providers will be the link between the qualification and student access to funding, and while industry or employers may need to drive some of these qualifications, they will not be viable without student demand and the ability of providers to deliver to the specifications. Risk in this area will also primarily lie with the teaching provider and student, which will require mitigation strategies put in place specific to those stakeholders. In the majority of cases, it will be those who act as awarding bodies, not as teaching providers, who will be submitting qualifications for approval. The current distance, as expressed to us by our members, between these awarding bodies and the providers themselves, creates a risk that they will create qualifications in the interest of temporal commercial gain without working sufficiently in partnership to ensure they are deliverable, assessable and in the student interest.

There is a risk more broadly of the proliferation of qualifications for which the experience of learners or their competence on completion cannot be assured. This would have a significant negative impact on the reputation of both the provider and the technical education sector. This risk is not limited to this category of qualification, but it is perhaps under this category where it could be most significant. Responsibility for the student experience and for student outcomes within the LLE lies with the teaching provider regulated by the OfS to assure accountability for student finance. It is the teaching provider who is best placed to identify and rectify where these risks may be likely to occur.

Question 10: Do the intended categories exclude any qualifications which are of benefit to students and employers? (Please be as specific as possible)

This model covers qualifications up to level 6. Many IHE members also offer professional technical qualifications which meet some or all of the occupational maps at level 7 which do not currently attract funding, and so members would benefit from the model being expanded to recognise qualifications at this level. LLE would also need to be expanded to include level 7 qualifications in the funding model, which we hope the Department for Education (DfE) will consider as the LLE is rolled out.

Question 11: Do the intended categories further the aim of improving accessibility and/or raise any equality issues regarding people with protected characteristics which IfATE should consider further?

IHE welcomes the proposed introduction of further categories of qualifications as we believe it will positively support student choice. This is critical to support widening access to higher

education and to meet the needs of diverse learner groups including those with protected characteristics. For our members it is key that the model enables students to build their own learning journeys and study in a way that meets their needs. The ability to offer smaller modules/qualifications is essential, as these allow students to specialise, retrain, or try something new out without committing to a larger qualification – as well as to study part-time, on weekends, or through a fast-track model.

However, we also note the potential missed opportunities and risks to improve accessibility and support access to qualifications for learners with protected characteristics.

Firstly, we are calling for IfATE to introduce a 'provider test' as part of the approvals process. Our members feel this is critical to ensure that all qualifications created are deliverable and take into account the students who undertake them. The risk of qualifications entering the market that have been created without sufficient provider input is a negative experience and outcomes for students, especially for those from underrepresented groups and/or with protected characteristics. A 'provider test' could assess eligibility requirements, teaching, and assessment methods, and ensure that it supports all students to succeed – including those with protected characteristics. It would also ensure that the qualification meets employer/ industry needs and will support positive outcomes for students on completion.

In consulting with our members one of their upmost concerns with the accessibility of technical education is the current over-reliance within the standard for students to be able to 'demonstrate' a competence in a 'workplace.' Funding technical education has the potential to support students with neurodiversity, disabilities, and particular learning needs to access skills education outside of the narrow constructs of a 'workplace.' The design of standards has been predicated on the learner being located primarily within an employer, following the apprenticeship model. Technical education removes the need for an employer, and with it the existing systematic discrimination many of these learners find within the workplace. By its nature, technical education has the potential to increase access to this vital skills education. Teaching providers have extensive experience of delivering skills education in diverse ways, and testing competency outside of a 'workplace.' We urge IfATE to reconsider their current framing of competency, and to engage teaching providers in the assessment of qualifications to ensure they can meet the needs of learners with disabilities and special educational needs by opening up the assessment of competency. It is often education providers who drive change for their graduates within an industry, and this expertise should be valued within the assessment process.

We also draw attention to our response to Question 7 in regard to joining up technical qualification routes with apprenticeship pathways. Apprenticeships provide a route to a higher qualification for learners who might not pursue full-time study. There are risks in the current system that apprentices who cannot or do not wish to complete their apprenticeship (for example who lose their role, wish to leave their employer, or wish to refocus their learning) will lose the credit gained and not complete their qualification. IHE urges IfATE to consider how to maximise the opportunities presented by this new model to create a system whereby students can move between apprenticeship and standard qualification routes. This will support all students, but especially those from underrepresented groups and/or with protected characteristics, and result in greater choice and support positive outcomes.

We also note that the proposed model seems to consider primarily younger learners/those without existing qualifications. IHE encourage IfATE to recognise and maximise the opportunity

through this model to reach a wider pool of learners – including mature learners and those who already have a higher qualification but wish to learn an additional skill or retrain without undertaking a large qualification. Many IHE members already offer CPD and technical skills courses which appeal to this group of learners and welcome the potential opportunities for receiving recognition and funding to support the growth of this provision.

Category 5 - Ensuring quality of modular design and clarity of supporting information:

Question 12: How can IfATE, through its approvals process and sharing of skills insights, best enable the technical education system to respond to emerging skills needs?

IHE supports the funding of modular learning within technical education. The flexibility of this will result in the creation of qualifications that are responsive to employer and industry skills needs, and work for diverse learners. Modularisation will support individuals who wish to develop new skills or specialise without undertaking a full qualification, and those who require a specific skill or competency to enable them to take a qualification at a higher level. Modularisation positively supports student choice and flexible learning experiences that fit around their work and lives.

We urge IfATE to promote modular technical higher education as an ideal way to upskill or reskill, particularly with the existing workforce. IHE members, using data and resources which pre-date IfATE's green skills toolkit, have been re-designing modules to support green skills within a particular industry or occupation. From architecture to fashion, IHE members are partnering with industry to develop and deliver qualifications which can meet the 30-credit module minimum set for the LLE on the FHEQ, but are focused on existing professionals who want to respond to their industry demands for more sustainable practices. It is vital that, where appropriate, they are able to do so on the RQF, to ensure students can have parity of experience across both routes.

IHE members have some concerns about the creation of a modular approval process within IfATE, including the significant increase in regulatory burden compared to the process required to deliver funded modules on the FHEQ, and the potential for duplicated and even conflicting approaches for assessing modular quality between IfATE and OfS. We urge IfATE to work closely with OfS to ensure that any process designed by IfATE to assess modular quality at the initial stage is aligned with OfS quality assessments with the clear aim to streamline regulatory processes to reduce burden and avoid conflicting regulation. Assessments of modular quality should have the same principles applied regardless of if the module forms part of a RQF or FHEQ qualification.

There are some challenges that the use of occupational standards poses for a modular model, in particular with regard to ensuring the transferability of modules/credits between institutions and the ease with which students can 'build' full qualifications. This will particularly be the case should students wish to use their modular credits to switch between the RQF and the FHEQ, or even within qualifications across the four categories proposed above. It is important that any IfATE assessment process at a modular level, play a role in facilitating credit transfer and stackability. More broadly, IfATE is in a unique position to offer insight and employer perspectives on module transfer within the technical education space, or encourage skills-focus modules as a positive way for students to bring more applied knowledge into qualifications designed with a

broader learning outcome. An example would be students studying broader computer science qualifications looking to bring in skills aligned with the level 4 digital product manager occupation standard such as product delivery, prototyping, and sustainable product development.

IHE is supportive of providers seeking to develop modules and qualifications to meet emerging skills needs and welcomes the development and sharing of skills insights to support this through IfATE. As IfATE has identified, modules (like some aspects of qualifications) may become obsolete overtime and require updating. This will have implications for students undertaking these in a lifelong learning model as modules taken previously may no longer provide the skills or competences required for their final qualification. IfATE should consider their role in student and employer information, advice, and guidance in ensuring that modules continue to hold currency with employers and students know that there may be a time-limit for module credit, should students wish to stack modules into a qualification over time.

This also has implications for the approvals process. Our view is that modules which are developed or adapted in response to skills insights should not need to go through reapproval by IfATE. Instead, modules and qualifications should be approved initially by IfATE and then their ongoing quality and ability to meet student and employer needs should be assessed by regulators so as not to duplicate and cause additional burden. The Skills Insight tool will be useful for regulatory bodies to assess whether a qualification remains up to date and relevant.

For most IHE members, short courses and modular delivery have been at the heart of their offer since they first opened their doors. Delivering high-quality professional training and practical skills courses, which meet their student and industry's needs was how they built their successful brands. As such it is critical that the model and process designed by IfATE enable providers like our members to continue to grow this provision and make it more accessible through the LLE funding model.

Question 13: Do you agree with IfATE's proposed definition of a module outcome?

Not sure.

We feel that the definition of a module outcome should be flexible and broad enough to fit the diversity of modules and qualifications offered – recognising both knowledge, skills and competences developed. We feel it is for the provider to determine the outcomes that match their learning design and delivery, and how these can be best assessed.

Whilst we recognise that some modules will result in learners and employees being able to fulfil certain role responsibilities in a work setting, we feel that there should not be such emphasis on the 'performance of workplace duty or duties.' There is a risk that module outcomes become a checklist of tasks, which would be very challenging to assess. It is also undesirable from a student and industry perspective, as modules need to be equipping learners with a broad set of skills, knowledge, and competences that they can then apply in different roles and settings. An emphasis on a set of duties unhelpfully restricts the learning completed and its application.

We also feel that the terminology 'workplace' is in itself limiting, and does not reflect the nature of work as it is now. The emphasis on duties would also limit the transferability of modules on the RQF to the FHEQ and consequently make it difficult for students to build coherent qualifications.

Question 14: Do you agree that the module information IfATE has described represents the elements that should be made available to users of an approved qualification? (users to include students, providers, employers, etc.)

Yes.

Modular descriptions and the specificity of information captured will need to vary depending on the category of qualification, and we feel that IfATE should consider what information may be valuable to the specific categories. For example, IfATE may consider that modules which form part of a category 3 qualification, those that bring together aspects of multiple standards, may need more focus on the role of the module as part of multiple standards or within multiple career options.

It is also critical that providers are involved at the outset of a qualification being created. IHE is calling for a 'provider test' to ensure that any qualification created is deliverable and in the student interest. Providers will not be able to support students to navigate modular learning if they are divorced from the process of qualification and module creation and approval. This will result in a negative experience and outcomes for students, and as noted, a reputational risk for both the provider and the technical education sector.

More broadly, we feel that it is just as critical that there is sufficient, high-quality information, advice and guidance (IAG) for students to enable them to navigate a modular system and choose modules which meet their learning needs and that will result in them having the competencies they need for their chosen role or career path. The increased flexibility will mean that students can take modules across various occupational maps - they will need IAG to enable them to build these into a coherent qualification. Module information must align with IAG modules, unique to technical education, to ensure students are able to use the information provided.

Question 15: Is there any other module information you feel should be recorded to assist users' comprehension of their value, outcomes and place within the wider learning journey? (users include students, providers, employers, etc.)

Yes.

IHE supports the commitment to ensuring clearly expressed learning journeys for students. This includes information about linked or progression modules, so that they can understand where the module fits into their overall learning journey and where they could go next. As noted under Question 12, it will also be important as part of this that students can see how modules may have changed and if any are no longer supported by the qualification. To support joined-up student pathways we also suggest that, where possible, providers should be encouraged to provide information about whether their modules can meet the learning outcomes on the FHEQ, to allow students to potentially transfer credits to other qualifications.

It should also be clear if a module is aligned to an industry standard or professional body requirement, and where additional modules would be needed to meet the requirements for professional body status or accreditation.

Alongside the specific module outcomes, we feel it is important to note broader transferable skills developed – which will be of benefit to students, but also to employers. Employers will want to see the relevance of a module to certain roles or industries.

Question 16: Do you agree with the design principles for modular qualifications set out by IfATE?

Yes.

IHE supports IfATE's intention to not be overly prescriptive on the design of modules, to enable innovation.

IHE would also caution against increasing burden for providers in providing design requirements in addition to those set by regulatory bodies. We feel that the first and third stated design requirements (appropriate and relevant content that responds to student and employer need, and effective curriculum design) are also assessed by the OfS as the regulatory body for the LLE, so IfATE needs to work closely with OfS and not duplicate or create conflicting regulatory processes. Part of the challenge of the current model for the approval of technical qualifications is the regulatory burden placed on providers, especially small providers, and so we would caution against increasing this further still.

IHE also supports the grouping of qualification units to form a module. This matches the FHEQ so will helpfully ensure parity between the two frameworks.

Question 17: Are there any other design principles IfATE should look to enforce through approvals to promote the development of competence?

As noted above, IHE would urge IfATE to not add additional burden for providers by enforcing compliance with set design requirements in addition to those set by regulatory bodies.

Category 6 - Promoting system accessibility:

Question 18: What elements could be included in IfATE's approvals process to strengthen requirements relating to accessibility and EDI in qualification materials and assessment?

As noted in previous answers, it is important that IfATE consider the impact of a reliance on demonstrating competencies within a 'workplace' currently found across qualification materials and assessment due to the primary role of apprenticeships in the development of existing occupational standards. These qualifications are unlikely to be delivered within a workplace, and workplace elements may be restrictive for a number of students with protected characteristics, as many require place-based flexible learning which is often not compatible with workplace experience models. The role of teaching providers will be critical to ensuring existing standards can be adapted to learning environments more equipped to support students from underrepresented backgrounds than many 'workplaces.'

A move from an emphasis on 'workplace' will also ensure that technical education can be at the forefront of pushing for industry change. IHE members have been at the forefront of tackling in-built discrimination within the music, film/TV, and performing arts industries through novel

assessment of skills within the learning environment, demonstrating the role innovative approaches to reasonable adjustments can play in enabling students to undertake tasks believed too difficult for them in industry.

We also encourage IfATE to work closely with OfS in the development of any additional elements to the approvals process to ensure they can align with the regulators role in ensuring student success for students from underrepresented backgrounds. It is unclear how IfATE's EDI toolkit aligns with the OfS approach to Access and Participation planning and the Equal Opportunity Risk Register (EORR).

Question 19: How do you currently assess accessibility and monitor EDI outcomes within your own training or qualification design and delivery?

IHE member processes for assessing accessibility and monitoring EDI outcomes within training or qualification design and delivery vary, but all are impacted by the relatively small numbers of students within their provision. Small and specialist provision has specific advantages for many students from underrepresented groups, including more personalised tuition, greater access to specialist equipment and industry learning environments, more opportunities for learning within industry, or for industry to come into the learning environment. It is important that qualitative approaches to monitoring EDI outcomes be valued alongside more data-driven models.

One area that is notably absent in the IfATE process is the role that student feedback plays in the approval process. This is particularly important where IfATE regulates the qualification, and works directly with awarding bodies, and OfS will not. IfATE may wish to consider how students can be more directly involved in the approval process to support any assessment of accessibility or EDI outcomes, and to raise concerns where qualifications are presenting barriers to student success.

Question 20: What are the most important elements IfATE should prioritise in the development of an accessible levels 4 to 6 qualification system?

Moving away from roles rigidly aligned to occupational maps is critical to support an accessible qualification system. IHE members find some of the current occupational maps not supportive of inclusivity. This is particularly the case in certain sectors such as culinary professions and hospitality, whereby the occupation titles are a barrier for opening access to individuals from diverse cultural backgrounds. There could be an argument for moving away from a focus on 'occupation' in the way that qualifications are categorised and approved. In this regard, Category 4 is the most inclusive and accessible, in that qualifications can be created which have no existing occupational standard.

It is also critical that providers have input in the creation and approval of new qualifications, in order to ensure that they are accessible to students. As noted already, IHE is calling for the introduction of a 'provider test' to assess the eligibility requirements, teaching, and assessment methods, and ensure that it supports all students to succeed.

IfATE also needs to ensure that the requirements for the design and assessment of modules support all learners to succeed. Specifically, the proposed definition of a module outcome risks a negative impact on EDI due to the emphasis on the performance of workplace duties. This

does not account for individuals who cannot undertake an assessment of certain duties, though they have the knowledge to do so, and therefore could not achieve a successful outcome.

Question 21: Beyond the impacts already identified by IfATE, do you foresee any additional impacts which have not yet been identified?

With regard to the development of a modular system, consideration needs to be given to the student experience of learning in this way, in particular how to ensure that students feel a sense of belonging and part of a learning community. This can be more challenging for this type of delivery and will be especially important to consider for students with disabilities and other protected characteristics.

Question 22: Are there any sources of information or data that you know of, which could improve IfATE's assessment of equality impacts or may improve future impact assessments?

No.

Question 23: Beyond the impacts already identified by IfATE, do you foresee any additional impacts?

The introduction of additional and more flexible categories of qualifications might make it challenging for awarding bodies to identify the most appropriate route for approval. Further guidance will be required from IfATE to address this, and a level of flexibility to change category and adapt applications may be necessary until there is an established pattern for qualifications. This may particularly be the case whereby a qualification could fit into more than one category (for example, a qualification for a new role may also have some elements of existing occupational maps, so could be a Category 3 or 4 qualification).

This is of particular concern to providers who do not have awarding powers, and so will require awarding bodies to submit qualifications for recognition that they may have co-developed (the majority of IHE members fall into this category). The inappropriate categorisation of a qualification will have an impact on the size and delivery model, which will be felt by both the delivery provider and student. This further supports our case for the introduction of a 'provider test' so that providers can assure the feasibility and quality of qualifications being approved and ensure that they are categorised in a way which supports the optimum delivery model and experience for students.

Question 24: What is the likely impact of an increase in modular qualifications on the business models of employers, awarding bodies and providers? Please answer in the context (i.e., awarding body, provider, employer, other) that best suits your own organisation, but also feel free to give your views on other contexts.

IHE members welcome the increase in modular and professional/technical qualifications, and many already offer courses which could, as a result of the proposed changes, achieve recognition and funding through the application of credit by an awarding body. This would in

turn open them up to a more diverse student body - widening access to higher and professional technical education - through the availability of student loans. These courses already operate in a strong market position, given the reputation of the teaching provider, but are limited in their accessibility, as they are only open to students who have the required finance up-front.

We do however also highlight that recognition needs to be given to the resource and funding required to design and develop new, high-quality modular qualifications. Many small and specialist providers will face significant barriers to entering the new system, as they simply do not have the financial or human resources to undertake the work required. As such, we are calling for equivalent funding from 2025 for providers teaching qualifications on the RQF across all four new categories, as that which is provided under the Modular Acceleration Programme for providers on the FHEQ.

Contact IHE

- For more information, or to speak to someone about this consultation response, please email info@ihe.ac.uk
- Visit our website at www.ihe.ac.uk
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