

INDEPENDENT HIGHER EDUCATION

IHE response to the OfS consultation on the inclusion of higher technical qualifications in OfS student outcome measures

November 2023

1) *Do you agree that the OfS should introduce a split indicator that would result in it publishing information and regulating the outcomes for students studying on HTQs?*

Don't know

1. As an organisation that celebrates professional education and the preparation of students for professional and skills-based endeavour, IHE warmly welcomes the opportunity to consider the inclusion of Higher Technical Qualifications (HTQs) in student outcome measures.
2. IHE is also encouraged by the allocation of £16 million of funding in the 2023-24 financial year to providers with eligible learners on Level 4 and 5 qualifications, and notes that priority is given to supporting courses leading to HTQs. (Paragraph 5).
3. IHE urges the Office for Students (OfS) to reconsider establishing HTQs as a level of study rather than a split indicator. Our experience with courses which currently fit the HTQ model (many of which are quality assured or regulated outside of the OfS) is that they are distinct from other Level 4 or 5 qualifications, in that they are designed for specific career intentions. As a level of study, the OfS would be able to set minimum thresholds which align more closely with the intent of these qualifications, in particular thresholds for graduate outcomes. This would also enable further splits by subject, and other characteristics which would prove more difficult if HTQs were initially only a split indicator.

4. IHE strongly suggests that the Other Undergraduate category be reviewed further, with the aim of creating more distinct levels of study and splits, as evidence from our members suggests that there is significant difference in student outcomes across the levels and courses within. It is particularly noticeable when comparing outcomes of Level 4 or 5 courses designed as exit awards or transitions to further study, with Foundation degrees, which are considered in some subjects as the highest award required for transition to work.
5. Regardless of the OfS's decision to establish HTQ as a level or study or only a split indicator, IHE makes three recommendations on the approach to delivery which we feel will best meet the aims of the OfS's publication of data and safeguard the use of this data for prospective students.
6. Our first recommendation is that there should be an introductory, interim period where providers can review data produced from the exercise without it being used in publication or regulation.
7. Secondly, IHE would urge the OfS to explore greater demarcation of Other Undergraduate (OUG) qualifications so that comparisons of outcomes for Level 4 and 5 can be made more easily.
8. Thirdly, IHE members seek reassurance that the introduction of a split indicator for HTQs would result in clear and publishable data, for the benefit of current and prospective students, stakeholders and the wider sector. It is important that this data be representative of the student experience as policy in this area is still developing and relies on accurate data for decision making.

IHE recommendation 1: An introductory period

9. IHE suggests an interim period where HTQ data can be visible to providers in their OfS dashboard without publication or use in regulation, as it is difficult for IHE to unreservedly agree with the proposal without member providers having had the opportunity to see data first. The changes proposed by the Office for Students (the OfS) are significant, and our members – who are likely to see smaller HTQ numbers than other providers – would like to see the extent to which data may be suppressed due to smaller cohorts. IHE requests that we work with the OfS to explore aggregation models which could lead to more publication of data whilst reflecting the student experience. IHE has highlighted the possible consequences of different aggregation models – especially for small and specialist providers – in previous consultation responses e.g. in June 2023 for the consultation on the approach to publication of results of the National Student Survey¹ and in March 2022 for the

¹ IHE response to the OfS consultation on the approach to publication of results of the National Student Survey
<https://ihe.ac.uk/latest/publications/response-ofs-consultation-publication-nss>

consultation on a new approach to regulating student outcomes.²

10. IHE appreciates the consideration that the OfS has given to additional regulatory burden for providers with HTQs and agrees that this would be limited because providers are already engaged with their student outcome data. (Paragraph 35)
11. IHE strongly encourages OfS to delay the publication of HTQ level data until more HTQ courses are being offered. Because the HTQ roll out has been phased³ it would be inappropriate to publish data which does not represent the broader range of subjects being offered. IHE members believe that there is a significant risk in students making judgements about subjects that are yet to be delivered. Therefore, the interim period should reflect the phased roll out to ensure a critical mass of HTQ subject areas is reached.
12. IHE notes that if the proposals are implemented, the following data sets would be used: for continuation, as soon as student data for HTQs is available from the academic year 2023/24 and, and for completion, as soon as 2026/27 academic year data. For progression, if HTQ students from 2022/23 qualify in the same academic year and Graduate Outcomes survey is 15 months after, a progression indicator could be constructed in 2024/25. (Paragraph 32).

IHE recommendation 2: Undergraduate Other - Course or Level?

13. Our second recommendation relates to HTQs within a level of study.⁴ IHE reviewed current levels of study including definitions for Other Undergraduate (UOG) and the outcomes level set.^{5 6} We then considered the OfS proposal to introduce three course type split indicators: Level 4, Level 5+ and HTQ. (Paragraph 21).
14. IHE supports showing Higher Technical Qualifications (HTQs) separately in student outcomes data to other Level 4 and 5 courses. IHE welcomes the OfS proposal that if there was significant growth in HTQs, consideration would be given to different numerical thresholds for HTQs to other Level 4 and 5 for outcomes for continuation, completion and progression. (Paragraph 18). As noted above, we believe these numerical thresholds should be set when the data is published, following a delay to reach a critical mass of subjects.

² OfS Consultation on a new approach to regulating student outcomes <https://www.officeforstudents.org.uk/publications/student-outcomes-and-teaching-excellence-consultations/student-outcomes/>

³ Available HTQ subjects to 2025 <https://www.gov.uk/government/publications/higher-technical-qualification-overview/higher-technical-qualification-an-introduction#available-subjects>

⁴ What qualification levels mean <https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels>

⁵ What is a 'first degree' student? How does this differ from 'other undergraduate' students?

<https://www.hesa.ac.uk/support/definitions>

⁶ Setting numerical thresholds for condition B3 <https://www.officeforstudents.org.uk/publications/setting-numerical-thresholds-for-condition-b3/>

15. As indicated above, IHE believes that there may be merit in splitting out course types to an even greater extent than is proposed in Paragraph 21, for the benefit of potential students, students, providers and the wider sector.
16. Rather than the proposed Level 4, Level 5+ and HTQ, IHE posits that the categories could be arranged as follows:
- Level 4
 - HTQ at Level 4
 - Level 5
 - HTQ at Level 5
 - Level 5+
 - Foundation degree
17. We note that OfS currently splits to distinguish between courses that are Level 4 and Level 5+ (Paragraph 16). However, IHE considers that students on these courses have such different intentions and outcomes that data should be published separately, with separate thresholds. This is particularly the case for Level 5+ qualifications, most of which are designed for students progressing to Level 6 or 7 study and do not compare to the professional outcomes intended in HTQ or Foundation Degrees at Level 5.
18. As the Other UOG category is fundamentally different to the HTQ or the degree model, it is to the benefit to students, providers and policy makers to ensure we are measuring comparable student experience and outcomes. We put forward the categorisation above as most of these are likely to be 1-year programmes (apart from the Foundation degree) and they will have different continuation and progression metrics to the Foundation degree.

IHE recommendation 3: Clear and publishable data

19. IHE's third recommendation concentrates on the necessity of clear and publishable data. Splits in data for traditional university settings are likely to be more statistically reliable to splits in small and specialist settings, and proposed changes could lead to a split in data that, though published, may not represent the experience of current students. This would lead to the propagation of misleading information to prospective students, through onward use of the data that does not note the statistical unreliability.
20. Other Undergraduate (OUG) students in small and specialist providers often differ from the "average" OUG students in a traditional university. Indeed, c.50% of IHE members UG students are over 30, with many IHE member provider students studying for qualifications that are directly related to improving skills for employment. Additionally, many IHE members are uniquely interdisciplinary in their specialism. For example, some IHE members teach a creative subject alongside

Initial Teaching Training study, and this encompasses all their students, leading to more unique outcomes.

21. We note that smaller specialist providers are vulnerable to student number fluctuations. Whilst many IHE members considered that their current thresholds would look broadly similar if HTQs were removed from Other Undergraduate (OUG), some providers noted that their data could be suppressed due to small numbers. To better support smaller data sets we would welcome the opportunity to further explore aggregations and data publication options with OfS as the data develops.
22. Additionally, providers with a professionally focussed offering at Level 4 and 5 consider that their students are often more motivated by skill acquisition than by qualification acquisition. This means that providers who attract ambitious learners who undertake Level 4 or 5 courses in order to retrain or to move jobs may demonstrate less favourable completion or progression metrics, even where there has been a clear benefit for the student. It is for this reason that IHE has consistently advocated for benchmarks. We do not believe that benchmarks represent an acceptance of failure for some students, but rather that success looks different for this group.
23. Higher education providers run Foundation degrees where some courses are HTQs, and some courses are not. The OfS proposes that separating out HTQs from foundation degrees would allow better insight into HTQ delivery and into completion patterns (Paragraph 23). IHE consulted members to ask what the impact would be of removing HTQ data from their foundation degrees. Member providers who run Foundation degrees which would then be included only in HTQ data suggested that they would need to see data (where the change had been implemented) before they could make an assessment on the impact.
24. There are a number of higher education providers within the IHE membership who conduct teaching and learning activities for further education students. IHE appreciates the clarification that for FE colleges, no change will be made to the ILR but there will be a code on the ESFA data base of learning aims which will identify HTQs. (Paragraph 26).

Other HTQ topics of interest to IHE member providers

25. IHE member providers are excited by the opportunities afforded to students by the Lifelong Learning Entitlement⁷ and are actively engaging in the OfS' call for evidence on Positive outcomes for students studying on a modular basis.⁸ IHE

⁷ Lifelong Learning Entitlement <https://www.officeforstudents.org.uk/advice-and-guidance/skills-and-employment/lifelong-learning-entitlement/>

⁸ Call for evidence: Positive outcomes for students studying on a modular basis <https://www.officeforstudents.org.uk/publications/positive-outcomes-for-students-studying-on-a-modular-basis/>

would therefore welcome clarity to understand how these important schemes will be complemented by the inclusion of specific splits on HTQ data in student outcome measures. Additionally, it would be helpful if providers were given insight into the likely demand for HTQs from learners (volume and subject demand) and early perspectives from employers who have been consulted on the HTQ ahead of any decision, as this will impact their perspectives on the outcomes of HTQs.

26. IHE are mindful that HTQs will both sit between A Levels or T Levels and a Degree and be a route for people to train or retrain for high-skilled jobs. IHE would like to work with the OfS and others in the sector to ensure that whilst HTQs appeal to those of typical A and T level age ranges (16-18), they are also deemed attractive by older learners or career changers who want to increase their skills. In order to be a success, HTQS will need to be held in high regard as a learning option by younger and more mature students, as well as being valued by employers. It is for this reason that we encourage OfS to consider HTQs at course level to allow for accurate splits by such student characteristics as age.
27. HTQs are unique in their design, having been through the additional process of approval by the Institute for Apprenticeships and Technical Education. There is a policy intention, supported by several IHE members, that students be able to move more freely between HTQs and Apprenticeships in future. IHE member experience is that the nature of these courses will likely mean a different learning experience, with different priorities and outcomes for students. OfS should consider reviewing the appropriateness of the current NSS and Graduate Outcomes surveys in future to ensure they will produce useful and reliable data on this group of students.
28. The HTQ route provides students with a number of outcomes and, like other courses in the 'Other Undergraduate' level of study, progression to further study is one of those routes. The timing of the Graduate Outcomes survey can result in some 'Other Undergraduate' students recording unemployment or low skilled employment, when they have undertaken further study after completing their course below Degree level reducing their time to find a graduate job. As noted in previous consultations, we remain concerned that graduate outcomes is not appropriate for those students who continue study, and that students should only be included in the graduate outcomes population if they are not found in the student population 365 days before the graduate outcomes census date.

2) If you do not agree, do you have a preference for the approach that the OfS should take to regulating outcomes for students studying on HTQs?

29. IHE urges the Office for Students (OfS) to reconsider establishing HTQs as a level of study rather than a split indicator. IHE's suggested approach is outlined above in Question 1.
30. Throughout our consultation with members on our response to this consultation, there was concern that the volume of change in the higher education sector was

such that the current data collection and regulation system would not be fit for purpose by 2026, when the majority of changes would begin to show in data. A number of technical concerns were raised by members as part of our discussions on these proposals, such that there is significant doubt that the current regulatory model, and the data that supports it, could be fit for purpose in the new, more diverse higher education landscape we are fast approaching. We have responded to this consultation, which seeks only to address a very small element of a wider issue: that the existing data and regulatory system is fit only for full-time Degree level study and will not provide reliable and useful information or regulation for the changes we are likely to see over the next five years.

31. For this consultation we have called for time, and for a more considered approach to the issue of HTQs in higher education data. More broadly, we call on the OfS and the Government to review the wider data collection and use of data in regulatory processes as small changes around the edges of a system not fit for purpose will cause more damage and risk to the sector than wholesale change. We welcome the opportunity for genuine sector engagement on this issue, as the holders and users of this data have a lot to contribute in the question of its wider use.