

Middlesex University response to Government consultation on Higher Technical Education, September 2019**7. To what extent do you agree or disagree with the proposed aims of HTQs set out in paragraph 9 above?**

The higher education (HE) sector plays a substantial role in the current landscape for level 4 and 5 qualification accreditation and delivery with higher education institutions accounting for nearly a third of all level 4 and 5 learners. This provision in universities is often overlooked and Middlesex University welcomes the recognition in the consultation document of the role of HE in delivering higher technical education.

The aims of higher technical qualifications set out in the proposal (delivering knowledge, skills and behaviours needed for occupations; recognition by employers as high-quality) are valid. Middlesex University is concerned about the positioning of higher technical qualifications as 'alternatives' or 'rival' qualifications to apprenticeships or three-year degrees. Higher technical qualifications should be viewed as an addition to the lifelong learning system that allows students to progress on to further or higher education options. Current proposals do not adequately recognise this and there is a need for greater recognition of how learners progress through the education system often following complex pathways throughout their learning journey. In a lifelong learning system fit to meet the needs of the fourth industrial revolution higher technical qualifications at level 4 and 5 should sit alongside other qualifications such as apprenticeships and three/four year degrees.

8. Are there any points you would like to raise regarding our proposal for Awarding Bodies to voluntarily submit qualifications for approval by the Institute against occupational standards?

We are concerned about the implications for those qualifications which are not considered to be 'technical' for the purposes of the consultation. The consultation seems to imply that 'technical' education means STEM subjects with no mention of the arts and creative industries for example which have a strong technical profile. Such a definition is also problematic for many professional and public sector roles, for example policing where Middlesex University is working with a consortium of other universities to train police constables via a degree apprenticeship route making a major contribution to the Government's goal of putting 20,000 additional officers on the streets and professionalising public services.

The funding arrangements proposed are likely to discourage study in courses outside the narrow definition of technical education in the consultation. This could also deter individuals, including those from disadvantaged backgrounds, from progressing further with their studies, with consequences for social mobility and their capacity to contribute to the economy and society.

For those qualifications that are in scope, there is a lack of clarity on how the 'HTQ' badge will operate and whether it will replace existing qualifications as and when they gain approval or would be applied to existing qualifications. It is unclear from the proposals what will happen if a provider chooses not to submit a qualification for approval by the Institute. The proposals make clear the possibility, on the basis of potential government take-up of the recommendations of the Augar Report, of lower funding levels, but is silent on whether the Institute will consider the lack of submission as a negative factor. Universities are independent, autonomous awarding bodies that define and design their own qualifications while meeting the regulatory requirements of the Office for Students.

The process of qualification approval by the Institute must be as streamlined, rapid and clear as possible. Lessons from the apprenticeship approval process which created substantial unnecessary barriers and delays to programme development should be learned so providers are not deterred from applying.

9. What is your view on our proposal that, upon approval of a higher technical qualification, there should generally be no transfer of copyright? What are your views about the circumstances in which it could be appropriate for the transfer of copyright to apply?

Copyright should be retained by the awarding organisation in all cases, unless the organisation itself chooses to give up its claim.

10. As Awarding Organisations and Higher Education providers, how important are the following as incentives to encourage the submission of your qualifications for Institute approval?

- a. A clear mark of labour market relevance
- b. A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)
- c. Enhanced support for potential students through information, advice and guidance (e.g. careers advice)
- d. A swift and straightforward process for submission, appraisal and decision-making
- e. Other (please specify)

Please rank from 1 (most important) to 5 (least important).

a. A clear mark of labour market relevance

5

b. A competitive funding package (which could include higher tuition fee support, maintenance funding, or better loan terms for students)

2

c. Enhanced support for potential students through information, advice and guidance (e.g. careers advice)

4

d. A swift and straight forward process for submission, appraisal and decision making

1

e. Other (please specify)

3 – Assurances that the qualifications will allow for transitions to and from further and higher education.

As indicated above, Middlesex University is concerned about the capacity of the Institute to deliver a streamlined process given their relative lack of experience in this type of provision, ongoing commitments in T-levels and apprenticeship standards reform, and the expertise needed for specialist qualifications.

Higher technical qualifications should not be positioned as ‘alternatives’ or ‘rival’ qualifications to apprenticeships or three-year degrees but rather as an addition to the lifelong learning system that allows students to progress on to further or higher education options. The net effect of any changes to the system should not be to reduce choice or disincentivise certain routes. It is important to recognize the success of 3 and 4 year degree programmes, higher and degree apprenticeships with a track record of driving social mobility and employer demand.

12. Are there any points you would like to raise regarding our approach to retaining existing Ofqual and OfS regulatory arrangements?

It is vital that the system builds on the OfS’s existing regulatory processes to avoid duplication and unnecessary regulatory burden for higher education providers. OfS expertise is instrumental in delivering meaningful regulatory decisions and feedback. In addition, the OfS registration process confirms and assures the quality of provision by providers on the register. There should therefore be no requirement for another statutory organisation to be involved in regulating universities.

13. To what extent do you agree or disagree with the principle of the OfS applying technical ongoing registration conditions that a provider would be required to meet to indicate the high quality of their HTE provision? If you disagree, what could an alternative approach be?

Middlesex University is concerned that the proposal for the OfS to apply technical ongoing registration conditions for providers delivering high quality technical provision would have a negative impact on the new regulatory framework for higher education and its role in creating a level playing field for HE providers. There are many current providers already on the OfS register that demonstrate they are delivering high quality technical education including HNCs, HNDs, Foundation Degrees, Higher and Degree Apprenticeships, as well as traditional degrees with a strong technical profile, within their current provision. These programmes are not an ‘add on’ and form a core part of their offer to learners, employers and the local economy. With employers and learners already demonstrating confidence in these providers it is unclear what would be gained from separate registration conditions in the OfS process. Combined with the proposed separate approval process conducted by the Institute the proposed arrangements risk creating an imbalance in the regulation of providers and substantial regulatory duplication and burden.

16. To what extent do you agree or disagree that linking grant or capital funding to meeting the technical ongoing registration conditions would encourage providers to deliver high-quality provision?

As indicated above we have reservations about the introduction of additional technical registration conditions through the OfS.

22. To what extent do you agree or disagree that we should explore how providers that meet the ongoing registration conditions specific to Higher Technical Education could have access to a more competitive student finance package for courses leading to approved HTQs than those who do not meet the technical conditions? Why?

It is vital that resources and incentives are not diverted from existing viable routes that are already subject to high levels of quality-assurance. Approaches that are based on a principle of “levelling up” the support package available to students to drive quality across different sectors that operate in the tertiary space.

23. To what extent do you agree that there is a need and opportunity for more young people and adults (including those who need to upskill/retrain) to be undertaking HTE in the future?

Learners should be empowered to make the right decision for themselves and should be fully informed that undertaking a higher technical qualification can progress on to a full degree afterwards or later in life. Undertaking HTE presents significant opportunities to those who currently have level 3 as their highest qualification, as well as to those who are either in or out of work to retrain and upskill. As indicated above, Middlesex University believes that higher technical qualifications should not be regarded as an alternative to apprenticeships or three-year degrees but should be an addition.

25. To what extent do you agree with these measures to improve IAG for young people, adults and employers?

Universities through their access to schools have great potential to be the ‘one stop shops’ for careers information and guidance. Middlesex University’s outreach work with schools and colleges and pioneering work developing high quality careers information and guidance for young people is helping learners to understand the opportunities available to them. Our innovative [Make Your Mark](#) resources provide guidance for young people on what is likely to be the best pathway for them, including technical routes including apprenticeships, through a dynamic and interactive web micro-site.

Any approach to promoting technical education must target awareness at the early stages of secondary education or earlier. Decisions about whether to go onto higher education even at age ten are predictors of their decisions later in life and early intervention is vital for technical opportunities to be recognised by prospective students as a viable option.

Importantly, the positioning of higher technical education alongside ‘rival’ qualifications belies a perception of two separate academic and technical routes through education. This bifurcation of education into two channels does not reflect the varied pathways that learners take throughout their lives and the role that many universities play in delivering technical education. If our education system is to meet the needs of the 4th industrial revolution a convergence and alignment of previously separated conceptions of 'academic' and 'technical' education is required. In the context of information and guidance it is essential to avoid presenting academic and technical learning as alternatives to choose between. Middlesex University would prioritise communicating to learners how their education paths could

progress and the flexibility that is possible in and between the routes they take – this could mean higher technical qualifications build on the strong brand recognition of A-levels, apprenticeships and degrees.

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