



Department  
for Business  
Innovation & Skills

**A DUAL MANDATE FOR ADULT  
VOCATIONAL EDUCATION  
CONSULTATION**

**Response Form**

MARCH 2015

# A dual mandate for adult vocational education consultation - response form

A copy of the consultation document can be found at:

<https://www.gov.uk/government/consultations/adult-vocational-education-challenges-over-the-next-decade>

A further version of the response form is also available to complete on line at:

<https://bisgovuk.citizenspace.com/fe/a-dual-mandate-for-adult-vocational-education>

You can email or post this completed response form to:

Postal Address:

Strategic Funding Policy Team  
Bay G  
Department for Business, Innovation and Skills  
2<sup>nd</sup> Floor  
2 St Paul's Place  
Sheffield  
S1 2FJ

Email: [FE.reform@bis.gsi.gov.uk](mailto:FE.reform@bis.gsi.gov.uk)

If you are emailing the document, please include "dual mandate" in the subject box.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is: 16 June 2015

## Your details

Name: Gila Tabrizi

Organisation (if applicable): University and College Union (UCU)

Address: Carlow Street, London, NW1 7LH

Telephone: 020 7756 2500

Email: gtabrizi@ucu.org.uk

Please tick the box below that best describes you as a respondent to this consultation

- Representative organisation
- Independent Training Provider
- College
- Awarding Organisation
- Charity or social enterprise
- Individual
- Legal representative
- Local government
- Local Enterprise Partnership
- Large business (over 250 staff)
- Medium business (50 to 250 staff)
- Small business (10 to 49 staff)
- Micro business (up to 9 staff)
- Professional body
- Trade union or staff association
- Industrial Strategy sector
- Other (please describe)

## **National Colleges**

### **Question 1: How can the National College proposals be developed to ensure the employers across the whole sector benefit?**

The University and College Union (UCU) welcomes the recognition that the focus is on sector-wide employer benefits, rather than individual employers. This is crucial to ensure that national colleges are providing relevant, transferable curricula and qualifications which are of value to all employers and not suited only to the narrow interests of certain employers. There is always a challenge in ensuring that small and micro businesses are represented adequately. National college proposals should therefore be developed with input from the widest range of business representation such as Local Enterprise Partnerships, the Confederation of British Industry, the Federation of Small Businesses, local chambers of commerce, sector skills councils and trade associations, as well as active outreach to small business, to ensure that the full range of views is captured.

We are concerned that this question refers only to the benefits for employers- there are other needs to consider. Employers, learners, unions and the local communities in which these institutions are located should all benefit from national colleges.

In particular, ensuring that learners can benefit equitably from national colleges will require further thought and support. Learners who are younger or starting at lower levels are often not as mobile or confident in moving away from home as HE undergraduates, so there are questions around access and participation. A time limited scholarship fund is not sufficient to address fair access adequately- learners at national colleges should be eligible for the same levels of support as those undertaking a traditional undergraduate route.

### **Question 2: How can National Colleges best work in partnership with local FE colleges, private training organisations and HEIs?**

National colleges must form part of a seamless progression route from lower/mid-level vocational education at general FE colleges to higher level/specialist learning at the national colleges, rather than duplicating or competing with the local provision that already exists.

Our concern is that new institutions in other areas of the education sector (such as free schools, University Technical Colleges (UTCs), alternative higher education providers) have not been established with the intention of working in partnership with other local providers. Instead of collaboration between institutions leading to a rounded, well-resourced offer which meets the demands of employer, learner and community needs, we have seen competition leading to the fragmentation of the local offer, with some institutions failing to raise demand sufficiently. For instance, the low enrolment rates at many UTCs is a cause for concern.

What we don't want is the creation of an elitist tier of institutions which divert funding away from local provision for learners who are not geographically mobile or who need greater support to progress in their learning.

### Question 3: Which priority sectors should be targeted for future National Colleges?

UCU does not wish to answer this question.

#### Communications and branding

**Question 4a: Would you support rebranding English higher vocational education as either "Professional Education and Training" or "Professional and Technical Education"?**

Yes

No

Don't know

**Question 4b: If so, which would you prefer and why?**

Professional Education and Training

Professional and Technical Education

**Please explain your response:**

UCU is not convinced that a rebrand is necessary, and is concerned that this may just divert resources away from the real priority of improving provision and progression from lower level to higher level vocational education.

Improved advice and guidance would be more useful and would help to address any misunderstanding or lack of awareness of the routes available.

However, if there is to be a change, UCU would prefer 'professional and technical education' as this describes the nature of the education better than the alternative option.

**Question 5: Would you support a national advertising and marketing campaign for higher vocational education?**

Yes

No

Don't know

**Please explain your response:**

Vocational education has often been misunderstood and underrepresented, so a national campaign could be useful in raising the profile of vocational courses. Any such campaign would be most effective if it encompassed the full range of learning options and levels so that people are clear both about higher level opportunities and the pathways into those courses.

Although we would welcome such a campaign, it should not divert resources away from frontline provision. Furthermore, we do not believe that it would be a substitute for good information, advice and guidance to guide people through all their options. This is particularly important for young people but careers advice should be available at all ages.

There is also a need for vocational education to be properly resourced, so increased demand through a marketing campaign would need to be met with additional funding. If

the funding does not match the aspiration, it could damage rather than promote the vocational route.

**Question 6: What other means of promoting higher vocational education do you think would be desirable?**

For too long, vocational education has been viewed as second best or as a choice for those who are less able. This stands in contrast to many of our international competitors who understand the value of good vocational education, and where the public view it as a highly respected choice that leads to good progression, sustained careers and earnings.

Vocational education can be a powerful vehicle for social mobility and reducing unemployment. But we need employers on board and a culture change around the attitude toward vocational education.

We need to create conditions that support a better labour market for workers. Too many jobs are poor quality and offer low pay, no training and no prospects. Employers must be encouraged to value the role of education in building a productive, innovative, loyal workforce. We believe that education adds value to business and employers must view it as an investment rather than a cost.

To this end, UCU believes that off for training should be made statutory. Additionally, tax incentives and a system of industry-wide financial levies for training would help to promote the conditions needed to reverse the decline in training to ensure that the vocational education opportunities so badly needed are made available.

**Question 7: How can we encourage more individuals to study higher vocational education?**

Together with improving the status of vocational education, better education advice and guidance for individuals is needed so that people can make an informed choice about different learning options.

We also need to ensure that progression to high level vocational education from apprenticeships and lower level vocational education is secured, so that individuals can clearly see a route which leads to the same high quality destinations as traditional higher education.

**Part-time higher education provision**

**Question 8: How can we encourage more individuals to study part-time Higher Education?**

It is no coincidence that part-time participation plummeted with the increase in HE tuition fees and the removal of study grants. This meant that employers were much more unlikely to financially support their employees in taking part time courses. An Oxford Economics report to HEFCE found that the numbers of UK and European Union entrants with direct

financial backing from their employers for undergraduate part-time study fell by almost half in 2012-13 compared with the previous year, from 40,000 to 23,000.<sup>1</sup>

The fee rise has also meant that mature students, many of whom have existing financial and caring responsibilities, are taking on a much bigger risk in embarking on an HE course. Many have decided that it simply isn't worth the risk.

Current eligibility criteria for government backed loans to support part-time higher education are often prohibitive, and could be relaxed. Research by Claire Callender at the Institute of Education has shown that many part-time students are ineligible for loans because of criteria on equivalent level qualifications (ELQ), and because of the minimum requirement for students to be studying 25% of a full-time course, ruling out those wanting to take single modules of learning.<sup>2</sup>

### **A new overarching body to manage awarding powers for higher level vocational qualifications**

**Question 9: Should a new overarching vocationally focused body be established to grant higher vocational awarding powers?**

Yes

No

Don't know

**Please explain your response:**

There would be tension between higher education institutions delivering higher vocational education with their own awarding powers – many would not want to deliver a qualification from another awarding organisation as they have spent many years developing their own programmes. This move could therefore be divisive and add unnecessary bureaucracy.

It would be better to focus on employer, learner and worker engagement with vocational education to ensure course content, delivery and assessment is appropriate and meeting the needs of all parties.

**Question 10: How could we increase the role of employers in scrutinising applications for new awarding powers?**

There are awarding bodies that already involve employers, and UCU would recommend learning from existing good practice in order to build a suitable framework for involvement of all stakeholders. We must not forget other stakeholders in vocational education – employees, government, unions as well as employers.

---

<sup>1</sup> Pressure from all sides: Economic and policy influences on part-time higher education, HEFCE, April 2014, <http://www.hefce.ac.uk/pubs/year/2014/201408d/>

<sup>2</sup> Callender, C, The demise of part time higher education in England: who cares?, IoE, June 2014, [http://www.ioe.ac.uk/about/documents/About\\_Policies/Callender\\_-\\_FINAL3\\_.pdf](http://www.ioe.ac.uk/about/documents/About_Policies/Callender_-_FINAL3_.pdf)

**Question 11a: How can the role of National Colleges in defining qualifications, apprenticeships standards and assessments and curricula best be taken forward?**

A parallel example would be the relationship between HEIs and A Levels - they have to ensure that the qualification provides an adequate progression route for the learner. National Colleges will want to ensure that learners have access to prior qualifications that equip them for study at their centre.

**Question 11b: Should other, high performing providers be empowered to do this?**

Yes

No

Don't know

**Please explain your response:**

It is hard to answer this question without knowing what constitutes a 'high-performing' provider in this context. There is a risk that increasing the number of providers involved in defining qualifications will bring unnecessary complexity.

**Question 12: Are the right awarding powers in place to facilitate an increase in the uptake of HNC, HND and BTEC type qualifications?**

Yes

No

Don't know

**Please explain your response:**

UCU believes other factors are more important in encouraging improved take-up of these qualifications. Government should focus on improving student support, advice and guidance, and raising the status of vocational routes in order to stimulate increased demand for these qualifications.

**Question 13: How do we design delivery and assessment in a way which imparts work ethics, occupational attitudes and standards, while enabling learners to reflect on and improve these?**

UCU strongly favours a model of vocational learning which places education at its heart, with space for off the job learning and time for reflection built in and balanced with workplace learning. There should be structured time in the workplace with clear learning outcomes to ensure that the learner is receiving a good quality education. Wider learning aims such as citizenship education, and rights and responsibilities at work, should help students to form a broad base of transferable skills.

**Question 14: How do we develop these mechanisms without losing existing quality products that already meet these standards and which employers recognise and have faith in?**

UCU would caution against sweeping away existing products. Instead of reinventing the wheel, the focus should be to build on success by extending, improving and enhancing current qualifications. Robust quality standards are key to expanding appeal more widely.



## **Refocusing the Foundation Degree curriculum**

**Question 15: Should the Government be prescriptive about the role of employers in the design, development and delivery of Foundation Degrees?**

Yes

No

Don't know

**Please explain your response:**

UCU would not recommend government be prescriptive; there needs to be flexibility within the system to ensure that Foundation Degrees are able to stay relevant, use local expertise and appeal to students.

A better approach would be to set a minimum standard and framework that ensures quality without losing flexibility. We would also urge an expansion of the stakeholders considered; it is not just employers that have a role.

## **Reviewing Foundation Degrees Awarding Powers (FDAPs)**

**Question 16: Should we consider some form of specialised FDAPs rather than general powers to award any kind of foundation degree?**

Yes

No

Don't know

**Please explain your response:**

There is a need to protect the degree awarding powers process to ensure that institutions with the powers are properly regulated and are providing a good quality education. The move into the higher education sector by for-profit alternative providers makes the need for close regulation even more acute, in order to protect the UK's reputation and ensure only the highest quality courses are eligible for funding and support.

Specialist FDAPs could allow more colleges to be involved in offering FDs but it should not be forgotten that, despite their vocational nature, FDs are a form of higher education and should therefore be taught by staff with appropriate access to time for scholarly activity and research that will deepen and update their subject knowledge and pedagogy.

We are concerned by the statement in paragraph 154, which makes reference to differentiation between institutions. High level vocational programmes delivered by FE colleges are an important part of widening access and participation to higher education, and as such we would resist attempts to create a further divide between institutions. Vocational degrees are not simply higher education on the cheap and should not be viewed as a means to cut costs while maintaining participation.

**Question 17: Could the FDAPs process and/or criteria be changed to improve access while maintaining quality?**

Yes

No

Don't know

**Please explain your response:**

Please see response to question 16

**Question 18: How do we ensure that the quality assurance arrangements are appropriate to foster the right type of HVE (higher vocational education)?**

Quality assurance for higher education in the UK is carried out by the QAA on behalf of HEFCE. Until such time as these arrangements change, either through the quality assurance review currently being conducted by HEFCE, or through legislation in the form of a Higher Education Bill to bring in a new HE regulator (which we know will not be included in this parliamentary session), UCU would want all HVE being regulated by the QAA to ensure robust quality assurance in line with HE institutions.

**Work-based learning and higher vocational education**

**Question 19: Should all HVE courses involve work based learning?**

Yes ✓

No

Don't know

**Please explain your response:**

As part of providing a rounded education, vocational courses should involve work based learning. This will encourage employer engagement and a clear line of sight to work. However, flexibility should be maintained so that the educational experience provided is right for the learner, while meeting employer need.

**Specialisation in colleges**

**Question 20: Are there other lessons to learn from the implementation of the CoVE (Centres of Vocational Excellence) programme?**

Yes

No

Don't know ✓

**Please explain your response:**

**Question 21: Should there be a new status for colleges specialising in higher level vocational skills as the Institute of Public Policy Research recommended?**

Yes

No

Don't know ✓

**Please explain your response:**

**Question 22: How can we support FE colleges to achieve excellence in higher level vocational skills?**

By providing the necessary resource to enable them to achieve excellence. This includes capital investment in physical equipment, plant, libraries, etc., as well as greater investment in teaching to ensure that the best and brightest staff from different disciplines are attracted to and retained within colleges. Improving working conditions for college staff by raising pay, eliminating exploitative working practices and ensuring appropriate

opportunities for continuing professional development are important steps in reinforcing higher vocational education as an equally esteemed route.

Additionally, students must be given the necessary support to allow equal access to the full range of vocational skills provision.

Finally, government should take a holistic view of vocational education. Funding should not be weighted disproportionately towards higher level skills at the expense of support for other parts of FE which form the pipeline for getting students into higher vocational courses.

### **HVE in the higher education setting – extending the role of universities and links with research and innovation**

#### **Question 23: What are the barriers to effective collaboration between colleges, universities and Catapult centres?**

There is no facilitation for such partnerships to develop. If government could assist with building a collaborative space for these institutions, facilitating relationships and communications, this would help. Consideration for geographical location also needs to be considered – in large, rural areas there will be extra difficulties in joining up work and providing accessibility for learners.

Furthermore, all need adequate funding so they are not competing and can work collaboratively.

#### **Question 24a: Should all Catapult centres be engaged in developing vocational education and higher level vocational skills training?**

Yes

No

Don't know

#### **Question 24b: If so, how best can this be achieved?**

#### **Question 25: What should the role of universities, colleges and Catapult centres be in growing technician level skills?**

Industrial sectors need to articulate their skills needs to providers so they can shape their offer accordingly. However, these institutions can also help to forecast the skills needs of the future as they are the places where research is applied to industry and so are at the forefront of change. Importantly, they can also help stimulate demand by educating employers in how to use technician level skills to grow and improve their businesses.

#### **Question 26: How do we ensure even stronger employer/university engagement?**

Proper funding, development of space for engagement and dissemination of good practice.

## **Stronger virtual learning and use of technology**

### **Question 27: How can Government drive the further adoption of new technology in FE institutions?**

FE colleges are often very keen to adopt new technologies, but the funding is not always there to support them. We must be very clear that technology cannot replace good teaching, and that it is an additional resource to be used for learning.

## **Making the overall system more effective**

### **Question 28: What is the best way to ensure greater local accountability on the part of providers towards learners and employers, in terms of relevance and quality of provision, and social and economic impacts?**

Crucially, governing bodies must be representative of the full range of stakeholders including staff, students, employers and local communities.

UCU agrees that accountability is important and information should be provided, but accountability frameworks must be clear that certain factors are outside of the control of providers and affected by local labour market conditions – e.g. level of earnings of past students.

It would also be great to provide evidence of success within the local area – for instance where a provider has educated a workforce (e.g. a new cinema is opening and a whole workforce of local people have been trained and qualified). Good practice should be shared and celebrated.

### **Question 29a: What benefits would there be to commissioning Adult Skills Budget provision through local partnerships or through a lead provider acting on behalf of a partnership?**

Local partnerships of providers would be well placed to ensure that money is used wisely to address local need, and this approach would potentially allow for greater local responsiveness.

### **Question 29b: What downsides might there be to such an approach?**

It could be bureaucratic and difficult to manage partnership disagreements or breakdowns.

Also, giving power to a lead provider might result in less recognition for smaller or niche providers, potentially leading to a reduced offer for learners in particular localities.

### **Question 30: How do we ensure a stronger focus on outcomes without encouraging cherry picking of the easiest to help?**

Outcomes that are broader and take account for the hardest to help – so progression and engagement could be good outcomes, not just blunt qualification or attainment measures.

**Question 31: What issues would there be with supporting programmes of study rather than qualifications?**

We have programmes of study for 16-19 year olds. They include a mix of core subjects, general qualifications, vocational qualifications, work experience and enrichment activities. For adults this approach would be challenging because of the time and funding available for learning. Employers and individuals might be resistant to spending more time than they see as necessary on completing a programme. Many older learners want short, sharp, targeted learning.

The funding of such programmes would also be a challenge. However, there is merit in the idea of addressing issues with English, maths and work preparation alongside qualifications if these areas are problematic for the learner. Many learners who would not consider studying English or maths as standalone subjects are more prepared to do so when it facilitates other learning.

**Testing alternative approaches**

**Question 32: What risks do we need to cater for in testing out new local arrangements to deliver skills provision for unemployed individuals and those with skills below level 2?**

UCU welcomes the consultation's focus on the need for flexibility and responsiveness in meeting local skills needs. Providers are well placed to determine what interventions will be most effective in tackling local issues around low skills and unemployment.

Quality should be embedded in any new approach so that the value of learning being undertaken is recognised by the students and employers alike.

Arrangements should aim to address local need but remain transferable across other localities and sectors. Good practice would need to be shared effectively across local areas to reduce duplication and reinvention.

Finally, funding arrangements must focus on minimising bureaucracy and using available resource wisely. Effective partnership and a collaborative approach is key in this respect.

**Question 33: What new approaches can be taken on commissioning and funding streams to maximise the value gained from public spending to support unemployed and disadvantaged learners?**

The Work Programme, which introduced payment by results. includes a graded funding structure to account for the hardest to help. Despite this, the least successful customer group in sustaining employment under the Work Programme is people with disabilities. This shows that funding and support for this group is still not sufficient to break down barriers to the labour market.

Assessments of value gained also need to be set within the context of different groups and localities. Measuring progression as well as attainment would help to give a more accurate indication of the impact of public spending.

## **Community Learning**

### **Question 34: If we were to make the changes described in paragraph 208 of the consultation document, how should we look to phase them in over time?**

We are pleased to see there is recognition that funding issues have had an adverse impact on community learning. ESOL and basic skills courses have been badly affected and in some areas are at risk of disappearing altogether.

However, the proposals do not necessarily address the crux of the problem. Because funding is largely based on old data it is not responsive and does not allow providers to quickly respond to changes in the local population either in composition or need. We would urge BIS to consider increasing the responsiveness of community learning funding as part of these reforms.

### **Question 35: Would a greater focus on commissioning partnerships enhance partnership working and deliver a more coherent Community Learning offer?**

The distribution of funding and courses offered to learners by community learning providers has varied widely since incorporation. The sector as a whole, though, has worked hard to provide a safe space for adults who may not have the confidence or means otherwise to try out learning, creating local networks and support structures that promote inclusive citizenship and provide a stake in the community.

Partnership working is positive if it helps to strengthen the position of the sector and iron out the uneven distribution. However, we have concerns within a partnership model over who is ultimately responsible for providing community learning. If no one is directly accountable then it will be susceptible to being squeezed by other budgetary pressures and priorities. UCU would also caution against such partnerships should they lead to inferior terms and conditions for staff, for instance by Local Authorities setting up Local Authority Trading Companies, in effect privatising the service and leaving staff and learners in a worse position than before.

Furthermore, there is no clear indication of what would happen if a partnership broke down, so careful guidelines would be needed to manage the partnership relationship and responsibilities.

### **Question 36: What would be the pitfalls and unintended consequences that could arise from these potential reforms and how can we avoid them?**

We should be mindful of the impact any reforms might have on disadvantaged learners or learners with protected characteristics. Improving the responsiveness of funding could help, but it is important to recognise the role that community learning plays in bringing the harder to help learners into education.

Equality impact assessments should be carefully carried out and continuous monitoring after reforms are made would be essential to ensure that these groups are not being excluded or deterred from learning as a result of changes.

**Question 37a: Do you agree that some institutions, such as Specialist Designated Institutions (SDIs), play a unique role within the wider sector and should continue to receive funding on an individual basis?**

Yes ✓

No

Don't know

**Question 37b: Are there other organisations that should be considered alongside the SDIs?**

-

**Question 38: What would be the risks associated with these proposals?**

-

**Question 39: Would there be benefits from greater integration of Community Learning and Adult Skills Budget funded provision?**

UCU would be concerned about the community learning budget being eroded if it were to be integrated into the Adult Skills Budget, due to the pressures that this other budget is under. Although an integrated budget could help to simplify funding for progression routes, this would be rendered obsolete should the initial step to learning, through the community learning sector, have its funding eroded within a larger budget.

### **Supporting the development of resilience in the sector**

**Question 40: What are the barriers preventing some colleges from adjusting their provision and approach?**

The insecurity of the current funding environment is making it difficult for colleges to plan and develop their provision effectively. The sector needs a long-term vision and stability of funding.

**Question 41: What lessons can we learn from colleges who have already made significant changes?**

Government should take time to liaise directly with college leaders, staff, students and unions at institutions where significant changes have taken place in order to gather evidence and good practice.

**Question 42: How can relationships between localities and FE providers be strengthened?**

Governing bodies of FE providers should include representation from the local community as well as staff, students and employers. Additionally, FE provider representatives should be included in other local governance structures and decision-making bodies. Greater involvement with Local Enterprise Partnerships would be helpful- many have been

successful in engaging with individual businesses but some less so with sectors and education providers.

**Question 43: What are the risks to colleges and providers with the shift towards greater local influence and control over skills funding and accountability?**

A lack of a coherent national perspective could lead to duplication and inefficiencies, so it is important that appropriate information sharing mechanisms accompany any further devolution of skills responsibility.

It is unclear how local areas will be expected to balance potentially competing local and national priorities.

In terms of funding, existing provision will inevitably be at risk if it is not deemed an economic priority, but it might be highly valued by learners. Local decision-making about future skills priorities must therefore include meaningful consultation with learners, education staff and employers.

There is also a real risk that localised skills funding will lead to further fragmentation of a declining funding pot. The piecemeal approach to regional devolution increases the risk of volatility and incoherence across different parts of the country.

**Question 44: What are the advantages/disadvantages of Central Government taking an active intervention role in the FE landscape, including supporting new entrants and/or supporting mergers and rationalisation?**

**Advantages:**

Oversight and intervention from central government is helpful in providing objectivity and accountability. Additionally, it facilitates a more joined-up approach between government departments, and allows for lessons learned in one locality to be applied elsewhere.

**Disadvantages:**

Any intervention from central government would need to be carefully balanced against expressions of local will, and would need to be conducted in consultation and partnership with local governance structures to ensure that top-down measures do not undermine local priorities.

**Thank you for taking the time to let us have your views on this consultation. We do not acknowledge receipt of individual responses unless you tick the box below.**

**Please acknowledge this reply ✓**





© Crown copyright 2015

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](http://nationalarchives.gov.uk/doc/open-government-licence/version/3) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available from [www.gov.uk/bis](http://www.gov.uk/bis)

Contacts us if you have any enquiries about this publication, including requests for alternative formats, at:

Department for Business, Innovation and Skills  
1 Victoria Street  
London SW1H 0ET  
Tel: 020 7215 5000  
Email: [enquiries@bis.gsi.gov.uk](mailto:enquiries@bis.gsi.gov.uk)

**BIS/15/145RF**