

**Federation of Awarding Bodies final response to IfATE's consultation on the approval of Level 3 technical qualifications.**

The Federation of Awarding Bodies is the representative association for vocational and technical awarding organisations (AOs) with 116 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies. Our members operate across a wide range of vocational/technical sectors and provide high quality qualifications to support learners to progress into, and within, their chosen sector.

This evidence submission is provided on behalf of the Federation's membership. It was developed following a consultation event and a draft was then made available to all members of the Federation for feedback before it was finalised.

While a range of views from members have been collected, AOs are a diverse community and our members may make individual submissions containing their own perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

**Q4 What current barriers do employers face when looking to utilise technical qualifications for workforce development and/or recruitment?**

Currently AOs work with employers for syllabus development and have found that employers state their main barriers to be accessing funding; being able to allow staff time off for development; and knowing which qualifications are of value in each area.

However, it was also felt that the government's mantra of employers not understanding the landscape is being over played. Indeed, the government's own research, including the recent Ofqual perceptions survey, demonstrates that employers are broadly satisfied with the VTQs on offer.

Many commented that awarding bodies also face barriers when trying to engage employers with qualifications validation, with time commitments being the greatest barrier. In the end, we need to ensure an employer-informed qualifications system. With over 5 million firms, the majority of them SMEs, it is unrealistic to think that employers can get very involved in the minutiae of skills and qualifications design and development. Like the customers employers themselves serve or sell to, they expect the skills system to come up with products and ideas they will find useful.

**Q5 We plan to provide guidance to awarding bodies to help them with the shaping of their development priorities/ approaches. This guidance would be developed by employers. Do you agree that this would be helpful?**

Yes

Employer insight is welcomed. However, other respondents should be considered too. It is unlikely that employers will have to hand data on labour market trends, skills shortages and rising skills demands which would also be needed to inform development priorities. Given that one of the major reasons cited for the reforms is that employers find the qualifications marketplace confusing, members questioned if they are best placed to provide meaningful guidance.



Members questioned how employers are selected and will be used to develop this guidance. We saw, for example, with the reformed apprenticeship agenda and Trailblazer groups, including the employers consulted for the development of T-Levels, that the usual government contracted companies were used – often large blue chips with a vested interest in telling the government what it wants to hear.

Indeed, there is a real accountability deficit that goes to the heart of these reforms. We are told that it is what employers want, but when challenged, it is hardly ever forthcoming that these employers are prepared to offer up their demands publicly or be accountable for them.

It was also suggested that rather than ‘guidance’, it is presented as preferences, requests or suggestions. Further clarity is needed on what the guidance is to be used for – employers are not education experts, and members are concerned about the extent to which they will be leading development. They felt that rather than developing new guidance, it could be incorporated into ongoing policy and procedures.

**Q6 What information would it be most useful to include within our strategic guidance to inform the development priorities/ approaches of awarding bodies?**

As in Q5, members felt that the guidance might be better presented as preferences or suggestions that fit around current procedures. They also want to see input from smaller employers that are more representative of the demographic of UK employers rather than using larger corporations.

**Q7 Are you clear as to where the different types of qualifications will fit in the categories described?**

Somewhat unclear

Members were concerned about the lack of guidance around what to do if a qualification fits more than one category, and that because the categories are open to interpretation different AOs may categorise the same qualification in different ways. Further information is needed on what would happen in this situation.

**Q8 We have set out our proposed approach for pre-defining additional specialist areas and cross-cutting functional areas against which awarding bodies can submit qualifications. Do you foresee any issues with this approach?**

We did not receive any feedback from members on this question.

**Q9 Do you see a need for IfATE to introduce an exceptions process to allow awarding bodies to submit proposals for developments in the additional specialist and cross-cutting functional areas?**

Yes

The consensus was that it was difficult to answer this question without clarification on how ‘exceptions’ are defined.

**Q10 Do you agree that the evidence requested is sufficient to assure IfATE of employer demand for submitted qualifications?**

We did not receive any feedback from members on this question.



**Q11 Do you have access to any additional data/ evidence which you feel IfATE should consider when assessing the employer demand for submitted qualifications?**

Yes

Members stated that they would welcome the Institute considering other forms of evidence such as survey methodologies as it is difficult to engage employers in this process and creates further administrative burden. Allowing input from smaller, specialist employers and from other third parties (such as specialist sector bodies) would also be welcomed.

**Q12 Is the proposed process clear for submissions into the employer proposed category?**

Yes

It is felt that while the process is clear, it seems very slow.

**Q13 Are you clear as to our proposed criteria for testing content aligned to KSBs within occupational standards which are published by IfATE?**

Somewhat clear

Queries have been raised around the use of the Institute's occupational standards in areas which use UK-NOS instead. Our members find it considerably problematic and a strategic barrier to the effective workings of the UK's single labour market that IfATE's occupational standards are for use in England only, when these qualifications may also be used in Wales, Northern Ireland and Scotland. There is also a clash in some standards set by professional bodies, which will automatically be recognised over IfATE standards in many sectors.

Members also fed back that standards take a long time to develop, by which time qualifications may have fallen out of regulation or funding. We believe a fundamental rethink of this whole new process is required.

**Q14 Are you clear as to our proposed criteria for testing content aligned to pre-defined duties which are published by IfATE?**

Somewhat clear

This is somewhat clear in that it is understood that the content will be reviewed against pre-defined duties. However, as AOs have not had sight of this yet it is difficult to comment on how clear the criteria itself is.

**Q15 Are you clear as to our proposed criteria for testing content which does not align to any outcomes which are published by IfATE?**

Very unclear

Members felt unable to answer this question as there is not enough information available. Further detail is needed on the criteria before meaningful comment can be made.



**Q16 Are the assessment design flexibilities allowed helpful to ensure difference between occupations can be reflected within assessments?**

We did not receive any feedback from members on this question.

**Q17 Is the guidance provided around assessment design sufficiently clear to facilitate the development of high-quality assessments?**

**No**

The concept of 'high quality' has been used throughout various consultations relating to these reforms at Level 3. Our members would like to see a clearer definition of what 'high-quality' means in practice and the impact it has, in outcome terms, on teaching and learning. Members also felt, when reviewing this question, that they are being measured against a 'flawed slogan', not least because it will always be difficult to meet a quality standard that has been (to date) so ill-defined.

The key to tackling any real or perceived 'low-value' or 'poor-quality' is via robust regulation. That is the job of Ofqual as the independent statutory regulator of qualifications in England. If IfATE is arguing that it needs to take additional measures to facilitate the development of 'high-quality assessments', then this raises serious questions about what exactly Ofqual has been doing and regulating all these years.

**Q18 Do you agree with IfATEs proposed requirements relating to the accurate description of content in qualification titles?**

**No**

Members felt that all the information that is being requested in titling is making them unnecessarily bureaucratic and unwieldy.

**Q19 Would it be helpful to employers if the title of a qualification included confirmation of employer endorsement following approval from IfATE?**

**No**

Approval by a regulator should act as endorsement. Members felt that adding employer endorsement is not needed, as it has not been used for T Levels and as the qualifications in question are alternatives to T Levels and A Levels, there should be no need for this additional step.

**Q20 Do you agree that the publication of KSB mapping in occupational entry qualification specifications is beneficial to employers and providers?**

**Yes**

It was agreed that this would be beneficial.



**Q21 If you are an awarding body, what EDI data do you currently collect for students who undertake your qualifications and would be prepared, and able, to share it?**

We collect EDI data and would not be prepared and able to share it

Members queried what kind of information could be requested and for what purpose? There is potentially a data protection issue here that would need to be navigated and members felt that further clarity is needed before they would be prepared to share any data. The Federation has recently published its own EDI Action Plan for the industry and would be very happy to share how we plan to measure progress in this important area of the sector in future.

**Q22 If you are an awarding body, how do you plan to embed our sustainability and digital skills frameworks in qualifications?**

We had some feedback from members who have previously developed T Levels and HTQs, and they advised that they would take similar approaches as these have already been reviewed and approved by the Institute.

**Q23 With reference to the impact assessment published in Annex A, are there any additional steps that could be taken to mitigate any negative impact, resulting from the proposed approach to approvals?**

Yes

Regulatory burden is of enormous concern to our members as set out in our *Feel the Weight Report* (2021). It must be a priority for the Institute to provide collaborative and supportive guidance, rather than taking costly and punitive measures.

Gold plating of new regulations remains a serious consequence of qualifications reform in England. It is why we are looking forward to a new Prime Minister and government, committed to deregulating the supply-side of the economy, when they take office.

Administrative load and the financial cost of these reforms must be minimised to avoid AOs – particularly specialist and niche players - exiting the market altogether or shifting solely to unregulated provision. If the government really insists on gold plating these regulatory reforms, then one suggestion was made for public grants to be made available to AOs to help them comply with these costs.

**Q24 With reference to the impact assessment published in Annex B, are there any other potential impacts (positive or negative) that have not been identified?**

Yes

Members commented that there is a real lack of agility in being able to respond to emerging needs from employers if these changes go ahead. It is a strongly held view that the additional burdens placed on AOs by these new procedures may lead to more unregulated qualifications entering the market in future.