



# UNIVERSITY VOCATIONAL AWARDS COUNCIL

## UVAC response to: Review of the Future of Further Education Colleges – Second Stage

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### Introduction

The University Vocational Awards Council (UVAC) is the UK representative organisation of over 80 HEIs and FECs committed to influencing, promoting and supporting the development of vocational education and training in both higher and further education.

UVAC was established in 1999 as a not for profit organisation to *advance education for the public benefit* by championing vocational learning. As such, UVAC acts as an independent voice for higher education and further education on higher vocational learning.

UVAC undertakes the following activities:

- Advocacy – we champion vocational learning and represent our members' views on higher level vocational education and training to Government, funding and planning agencies and stakeholders.
- Membership services – we provide a portfolio of membership services including, disseminating information, production of good practice guides and the organisation of conferences.
- Research and publications – we manage a research programme covering the accreditation of prior experiential learning, vocational progression, unitisation, vocational qualifications and other issues as appropriate and topical.
- Awarding Body products – we support the provision of QCA regulated awarding body products to the higher education sector through appropriate. UVAC/awarding bodies agreements
- Through our sister organisation, the National Validation Council – Validation and Accreditation Services – we provide a range of validation and accreditation services covering foundation degrees, professional development programmes and initiatives to support progression from apprenticeship, vocational and work-based qualifications to higher education.

Our objectives and work are also supported by our corporate members who include the Qualifications and Curriculum Authority (QCA), the Universities and Colleges Admissions Service (UCAS) and the Learning and Skills Council (LSC) - National Office. We also work closely with our strategic Awarding Body partners, commissioning appropriate research and supporting the development and implementation of learning products. Accordingly, UVAC is a unique organisation and an essential partner when engaging HEIs and FECs in the implementation of national vocational education and training policy initiatives.

As a result of the activities we undertake we aim to ensure:

- More learners have the chance to progress to and benefit from higher education.
- Barriers preventing different groups of learners access higher education are identified and addressed thereby widening higher education participation.
- The quality and relevance of higher education provision is enhanced for the benefit of individual learners, employers and the nation as a whole.

## Summary

*As we recorded in our response to the first stage of the review, 'UVAC welcomes the review of further education colleges chaired by Sir Andrew Foster. Further education colleges are the Cinderella of the education system; they perform a fundamental role in providing opportunities for lifelong learning and giving hundreds of thousands of young people and adults a second, third or fourth chance to benefit from learning. They play a major role in supporting social inclusion, widening participation and support individuals develop the skills needed by local economies in general and employers in particular. This is where we believe the activities of further education colleges should be focused, they should have a lead role in the provision of vocational provision (to NQF level 3), be local conduits for HE provision, whether direct or indirect and reach local agreements on the delivery of 'A' levels.*

*The role of further education colleges as centres of lifelong learning should therefore be championed and celebrated and not be diluted by moves to change status to higher education colleges, or to refocus on tangential activities. We would, however, note that the performance of the further education sector does vary and that some colleges are far more effective than others, particularly in key areas, such as responding to the needs of employers and local communities. A fundamental objective of the review should therefore focus on how the profile of further education colleges could be enhanced and how the overall performance of the sector could be raised to match the performance of the best institutions. We would also suggest that any consideration of amalgamation, mergers, or reducing the number of further education colleges was based on the needs of their customers; local communities, learners and employers and not on the preferences of funding, quality assurance or inspection agencies.'*

**A crucial issue in respect of higher education delivery in further education concerns the status and funding of non prescribed higher education – a significant route to professional qualifications for over 60,000 learners.** Non prescribed higher education comprises significant areas of higher education that is not funded by HEFCE but instead funded on a discretionary basis, by the Learning and Skills Council. Non prescribed higher education concerns the delivery of flexible higher learning provision often focusing on the 'have nots' of the learning system and those who are unlikely to benefit from 'mainstream' higher education provision. Unfortunately, the LSC's focus on level 2 provision and the separate funding arrangements for non prescribed higher education leads to anomalies about how it is categorised and uncertainties about how it is valued. The use of the term 'Non-Prescribed Higher

Education' also undermines its status and the value of such learning in higher education. Describing any form of learning provision as 'non-something' tends to give off negative feelings. **In the interests of tens of thousands of learners we strongly recommend that the Review considers how non prescribed higher education should be funded properly on a long-term, consistent basis, valued and given a title that correctly reflects its importance in opening up higher education to new groups of learners.**

Given UVAC's remit, our analysis and observations largely focus on the role of FE colleges in the provision of higher education, vocational progression, the FE/HE interface in general and the relationship between FECs and HEIs in particular.

**Missing Questions** – The second stage of the consultation raised the issue as to whether any questions had been missed. We believe that the role of further education in higher level learning and the relationship between further education colleges and higher education institutions should be a central feature of the review and regret its current absence from the questions posed. Such relationships are complex and vary between localities and institutions. Many further education colleges, particularly the Mixed Economy Group, play a fundamental role in the provision of higher education. Approximately 10% of all higher education provision is provided by the further education sector. How further education is funded and supported to delivery higher level learning is a critically importance issue, not least for individual learners and employers. The relationship between FECs and HEIs are complicated and a variety of models exist which reflect local circumstances. In determining the relationship between FECs and HEIs, geography matters. Where a locality lacks the physical presence of a HEI, then FECs and HEIs should be encouraged and supported to develop delivery partnerships. In other cases the presence of an HEI in a locality with a track record in supporting progression, working with employers and developing vocational provision could mean a decision by a FEC to offer provision could result in duplication of activities and confusion for learners and employers.

Where there is a justification for a FEC to offer higher education provision, the regulations and operation of HEFCE, the LSC, QCA and QAA can cause difficulties and have an undue impact on the service provided to individual learners and employers. In particular:

- FECs cannot be the leading partner in certain HEFCE funding programmes
- FECs can find working with two funding regimes (LSC and HEFCE), quality assurance arrangements, QCA regulated awarding bodies, HEIs and inspection regimes a substantial burden
- Lifelong Learning Networks need to be developed as a more equitable partnership between further education colleges and higher education institutions.

Validation partnerships are also a crucial aspect of the further education/higher education interface. Many validation partnerships have worked effectively, others have been more problematic. UVAC recently established the National Validation Council (NVC) to provide a suite of validation services for FECs, employers and QCA regulated awarding bodies. The National Validation Council represents a sector led, cost efficient, friendly and responsive validation service working with FECs to raise standards and specifically meet employer needs. It is a genuine collective partnership working at local and national levels which will compliment regional and sub regional initiatives. So far, the NVC has attracted very high profile support from Edexcel, BP and GSK. Additionally,

the DfES, at ministerial level, recently approved the development, through UVAC and the National Validation Council, of an exemplar system and procedures that would validate, accredit or provide national credit for internal company management, continuing professional development and research programmes towards the award of higher education qualifications (foundation degrees, honours degrees, MPhils and even PhDs and associated certificates and diplomas).

To FECs, the sector led National Validation Council offers:

- A service to validate higher education programmes at all levels (including a unique offering of BTEC Foundation Degrees).
- A service that enables FECs to deliver learning programmes to national employer and professional standards (UVAC has discussed this issue extensively with a range of companies including GSK and BP).
- Support for FECs in the use of credit transfer and APEL.
- A system that supports credit transfer from QCA's Framework for Achievement to higher education qualifications and vice versa (initial discussions have been held with QCA).

This approach enables the best FECs to quickly strengthen their validation and quality assurance systems by working nationally with a consortium of HEIs who have the capacity to progressively delegate these functions over time as each FEC consistently meets the required standards. It compliments the emerging standards body and network by providing a practical one stop shop solution which is accountable to all the national quality assurance bodies.

UVAC would welcome the opportunity to meet with Sir Andrew Foster and the Review secretariat to determine how the National Validation Council could support the development of the role of further education colleges. In particular, the National Validation Council could potentially accredit further education colleges with an outstanding quality assurance record to validate their own qualifications.

## **UVAC Response to Specific Questions**

### **1. What is the main purpose of further education colleges?**

The main purpose of further education colleges should be to provide opportunities for lifelong learning and to give hundreds of thousands of young people and adults a second, third or fourth chance to benefit from learning. As such, further education colleges should play a major role in supporting social inclusion, widening participation and supporting individuals in developing the skills needed by local economies, both generally and by employers in particular. Further education colleges should have a lead role in the delivery of vocational provision (to NQF level 3) and act as local conduits for higher education vocational provision. Finally, they should support the development of provision required by their local economies and communities and operate on the basis of local circumstances and needs.

## 2. How would you simplify and clarify the management and accountability system?

We consider this question is best answered by individual further education colleges. We do, however, believe that the current system is too complex for those FECs delivering both further education and higher education provision as they have to conform to at least three quality assurance systems, individual universities, QAA, and QCA. The National Validation Council could simplify this and provide a one stop shop linked to the emerging new standards agency

## 3. How would you improve the learner's experience?

Learning should be recognised at whatever level, whenever and wherever it takes place. Further education colleges have a fundamental role in facilitating and supporting the delivery of learning that meets individual learner's needs. As we pointed out in our response to the first stage of the review at the higher levels of learning the learner's experience of further education could be improved by:

- *Support for and validation of work-based learning – Supporting, recognising and validating work-based learning at the higher levels is a neglected subject. Many individuals learn best by actually doing things, similarly employers want their employees to develop occupational competence and thereby support the development of their businesses. At levels 1 – 3 in the QCA National Qualifications Framework and Framework for Achievement recognising and developing occupational competence is achieved effectively (with some notable exceptions) through the NVQ system. At higher levels substantially more work needs to be undertaken to support, recognise and accredit work-based learning. With the exception of certain subject areas (e.g. management), take-up of higher level NVQs is limited, National Occupational Standards are rarely used and even in foundation degree programmes work-based learning achievements are not sufficiently recognised. With the experience of delivering NVQs and contact with employers, further education colleges offering higher education provision could be ideally placed to work with HEIs to develop effective approaches to the validation of work-based learning.*
- *Use of APEL – If more mature learners and those in work are to be better served by higher education provision, greater emphasis needs to be placed on APEL to recognise their previous achievements and future learning needs.*
- *Part-time and flexible delivery – Further education colleges offering higher education provision frequently excel at delivering programmes flexibly on the basis of learner need. We would anticipate that with the on-going development of foundation degrees and introduction of top-up fees will lead to a continued growth in the demand for part-time and flexible delivery. The introduction of top-up fees may also have an impact on the demand for vocational higher education courses vis a vis academic programmes, further education colleges will need to be in a position to be able to respond effectively.*

- *Credit rating, transfer and the development of higher education vocational education and training routes – Arrangements need to be in place to ensure programmes of study in FECs have appropriate credit rating and transfer values to enable individual learners to progress and gain maximum value from the learning undertaken. Further education colleges also need to have developed delivery partnerships with local/regional HEIs, or a national consortium to ensure foundation and honours degree students have the opportunity to progress to higher degrees including masters and PHD levels and professional qualifications.*
- *Recruiting and training the staff in colleges to work effectively at HE levels – Further education staff need to be recruited and trained to deliver provision at higher education levels. If FECs are to be able to compete with HEIs, staff contracts at FECs need to be changed to enable staff delivering higher education programmes to engage in curriculum development and applied research. This issue will also have implications for FEC budgets and staff recruitment policies and procedures.*

#### **4. How would you strengthen and improve the engagement with employers?**

Many further education colleges have an excellent track record in working with and engaging with employers. This track record should be celebrated and good practice identified and disseminated throughout the sector. The innovative use of employer led and SSC developed National Occupational Standards (NOS) are a proven tool for developing provision that meets the needs of employers. Their use should be encouraged and supported. We also believe that support and encouragement should be provided to encourage lecturers to work on a sabbatical basis in industry to refresh their skill and knowledge base.

We would also advise against over-playing the role of SSCs. The recent Skills White Paper gave, in our view, the incorrect impression that SSCs have a unique understanding of the skills needs of their sectors and are the way to work with employers, or for employers to work with education. We do not doubt that SSCs have an important role to play and believe that SSC developed National Occupational Standards have a proven track record as a tool that supports the development of provision that meets the needs of employers. SSCs are, however, new and largely untested organisations and vary in capacity and capability – they have an important role, but are just one way to support further education colleges work with employers.

#### **5. How would you drive quality improvement for colleges?**

We believe this question is best answered by individual further education colleges. As outlined in our response to question 2 the system must be simplified. This is not least because further education colleges ‘suffer’ from more inspections than schools and higher education.

**6. How would you develop corporate governance for colleges?**

We believe this question is best answered by individual further education colleges. The role of governors could, however, be strengthened. Proposals to give further education colleges given more autonomy should also be explored.

**7. How would you develop esteem in the sector and build its reputation?**

It is important that the role and purpose of further education colleges is appropriately defined and communicated to their customers and partners. That is, as previously outlined, the main purpose of further education colleges should be to provide opportunities for lifelong learning and to give hundreds of thousands of young people and adults a second, third or fourth chance to benefit from learning. This is the unique selling point of the sector. To communicate this message, case studies should be researched and published of what can and does happen in further education for those in work or returning to learning or generally educating themselves. Stories of how further education has changed lives should also be built into government publicity activities.

**8. What are the most important aspects of the workforce needs that must be adhered to?**

Learning takes place in a variety of environments, times, paces and levels. Some learning experiences are large, others far smaller. Further education colleges should have an important role in facilitating and supporting learning whenever and wherever it occurs. In supporting those in employment further education colleges should provide a flexible and supportive role stimulating and facilitating learning on the above basis. In recent years we believe that the balance between meeting employer and individual needs has become too biased towards short-term employer needs. We agree that, in many cases, employer and individual needs may converge, but this is not always the case. In particular, the narrowness of some (but by no means all) Apprenticeship frameworks restricts their value as a valuable learning product for an individual. Good quality up to date labour market intelligence also has a role in determining what provision may be needed, but it should be used with care and focus on individual and employer needs.

Secondly, the importance of further education colleges developing higher level skills has been downplayed through the emphasis on basic skills and level 2 learning provision. UVAC recognises the fundamental importance of developing basic skills and level 2 provision, but at a time of increasing international competition, particularly from India and China an over concentration on lower level skills is hardly the route to ensuring international competitiveness. Unfortunately, as outlined in our response to Question 10 policy responsibility for co-ordinating the provision of higher level skills provision is confused. This issue is demonstrated by the confusion over the funding of NVQs 4 and 5 and the fact that so few have been delivered. At the higher level there is also an over emphasis on using the foundation degree to meet the needs of the workforce. There is no doubt that the foundation degree has an important role to play, but so do HNDs, Vocational Honours Degrees, Professional Qualifications, Proprietary Qualifications and even NVQ Levels 4 and 5. Further education, like higher education must play a role in

assisting the self employed and encouraging business start-ups. Accordingly, further education colleges should be supported to deliver the qualification that is of most benefit to the individual learner.

**9. What role should FE colleges play in developing the vocational pathways described in the 14 – 19 White Paper?**

The concept of 14 – 19 vocational pathways is erroneous. Vocational learning programmes and qualifications should seamlessly link together from 14 through 16 – 19 provision to higher education, professional qualifications, continuing professional development (CPD) and propriety awards. Currently, level 3 vocational and work-based progression (i.e. progression at 19) is a mess. Neither Advanced Apprenticeship nor an NVQ Level 3 is an accepted higher education entry award. A key finding of a recent UVAC study, sponsored by the LSC, was that not more than 1 – 2% of Advanced Apprentices progressed to higher education. Furthermore, few higher education admissions staff understood what an Apprenticeship was, Connexions staff were unsure of what advice to offer Apprentices interested in higher education and the Apprenticeship completion certificate had no credibility in higher education. When and where progression did occur it was as equally likely to be to an NVQ level 4, vocational honours degree, HND as to a foundation degree, suggesting that an exclusive focus on progression to foundation degrees is inappropriate. We would accordingly argue that further education colleges should be at the centre of developing lifelong vocational progression routes, from Young Apprenticeship, through Apprenticeship, Advanced Apprenticeship to (with their higher education partners) higher education and higher level qualifications. Although further education colleges have a crucial role to play in this area, national co-ordination and leadership on defined tasks is essential. UVAC analysis suggests that many Advanced Apprenticeship frameworks are not fit for purpose for higher education entry an issue that must be rectified at national rather than local level. Finally, further education colleges should perform a pivotal role in ensuring the ‘learning value’ of vocational programmes at 14 - 19. In some cases Apprenticeships are far too narrow, focusing on the short-term needs of the employer rather than the long-term needs of the learner.

**10. How do we develop the leadership of the sector as well as leadership of colleges?**

UVAC strongly support the roles of the Association of Colleges and Lifelong Learning UK. We do, however, believe that the role of the Mixed Economy Group of further education colleges deserves greater recognition and support. As ‘cradle to grave’ providers covering all levels of provision from entry to post-graduate qualifications, the Mixed Economy Group has a unique understanding of vocational progression and a unique role in its delivery.

On the issue of leadership we should also comment that there is a lack of co-ordination and leadership at Government/Agency level at the level 3/4 vocational interface and further education/higher education interface. Which agency, for example, is accountable for ensuring vocational learners at level 3 have the opportunity to progress to higher level learning?

UVAC – August 2005