Q1 (pg 12) – To what extent do you agree or disagree with the proposed aims of the HTQs set out in paragraph 9 above

We particularly welcome these changes within STEM, an area with an ongoing skills shortage and an area where employers particularly value technical and vocational skills. These qualifications have the potential to increase the number of students taking on level 4 and 5 courses in engineering, where the biggest skills gaps in engineering are (as cited in the IET’s 2019 Annual Skills and Demand in Industry survey). For these aims to be a success, it will be important to ensure industry buy in across all sectors and sizes of businesses. Additionally, these qualifications should sit with a clear and distinct purpose that will attract students with particular learning styles or ambitions, this will help ensure that HTQs are not in competition with Apprenticeships and Degrees, but instead are able to encourage other people into the profession.

We also agree with the importance of education providing students with relevant skills and behaviours, which tends to be delivered in a work experience setting. However, we would question how these key skills and behaviours will be delivered in a classroom setting, especially for more vocational subjects such as engineering. Again, this will take close liaison with industry to ensure that these skills and behaviours are taught in a way that is useful and relevant to industry upon students completing the course.

Q2 (pg 16) – Are there any points you would like to raise regarding our proposal for Awarding Bodies to voluntarily submit qualification for approval by the Institute against occupational standards?

We agree that Awarding Bodies should be able to submit qualifications voluntarily. However, given the fairly short time scales mentioned in this section it will be important for the Institute to ensure that the quality of qualifications are not compromised. It will also be important that standards are the same across all awarding bodies to ensure consistency and therefore a higher level of employee confidence in the qualifications.

To allow people to move between qualification types through their lifetime there will need to be a clear link between occupational standards and other industry standards. This will make upskilling throughout careers easier for individuals.

Q3 (pg 17) – no comment

Q4 (pg 18) – no comment
Q5 – (pg 19) Would you support incorporating the above flexibilities/requirements in the Institute approval process, and are there any specific points that you would like to raise in relation to the above?

Alignment with professional bodies will be important for engineering as there already rigorous and industry recognised standards in place. The Engineering Council is carrying out a review of the standards of engineering education and competence which is due to be published in the Spring of 2020. For the first time, these standards include knowledge and competence outcomes at levels 4 and 5 which could allow a clear mapping and orientation of HTQs to established Engineering Standards (eg Incorporated Engineer, Chartered Engineer) and accreditation by professional bodies such as the IET, IMechE etc.

We do support the incorporation of flexibilities into the approval process. In the past there have been occasions where standards have been so tight they have fallen out of date with industry needs soon after their approval. This type of qualification will need to be agile and be updated regularly. Flexibility to include additional content will greatly increase the value of these qualification to the engineering industry. As a sector with varying regional needs, allowing local providers to tailor some content to their specific needs will be of great benefit. This flexibility should also allow providers to keep their courses up to date with new trends and emerging technology, helping to ensure that graduates are work ready.

Approving smaller courses would also greatly benefit employers looking to upskill their workers. This is especially true for SMEs who may not be able to give employees enough time off to complete a full course but are unlikely to have the capacity to upskill them in house. This could help ease some of the chronic skills shortage faced by engineering businesses.

Part time provision (alongside work experience) for level 4 and 5 qualifications is an important and effective model for many employers. This would allow businesses to upskill their employees without losing them entirely as a resource, especially valuable in industries that are already suffering from a skills shortage. It would also increase the access to these courses from individuals who may otherwise not be able to enrol due to their personal situations (eg caring responsibilities).

Q6 (pg 21) – no comment

Q7 (pg 27) Are the suggested criteria suitable markers of high-quality technical provision?

We agree with the aspiration expressed in this section, however we have the following points to raise in relation to the criteria above:

Further education already struggles to recruit a sufficient number of teachers, and this is without requiring them to be both experienced teachers and have current and relevant industry experience. To ensure colleges can source these teachers, they will require specific support from the government. This is especially true in STEM subjects, where we have a huge shortfall of teachers every year. Part of attracting the necessary quality of teachers will be ensuring that HTQs have a good track record with employers, but they will need time to build up this reputation.

In engineering, there would be a great cost attached to having facilities and equipment that are reflective of the workplace, which would likely be far too costly for most colleges to take on for
engineering, especially when FE is already very underfunded. This would mean that most of these
facilities would have to be accessed through partnerships with industry, something that some
colleges may excel at, but others would need support with to ensure parity of quality between
providers of these courses.

**Q8 (pg 27)** - 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?

While we agree with the principle that having rigorous ongoing checks on staffing, employer links
and facilities would be a good thing, we would caveat (based on our experience as an accrediting
body) that to do this effectively would require resources both from the provider to prepare evidence
and from whoever is assessing the evidence. We would warn against introducing a checking system
which does not involve meaningful assessment and is consequently of low value. Our view is that
unless sufficient resources are available to provide meaningful assessment, the OfS should not apply
technical ongoing registration conditions.

**Q9 (pg 29)** – no comment

**Q10 (pg 29)** – no comment

**Q11 (pg 30)** To what extent do you agree or disagree that additional non-financial support will be
needed to enable providers to develop their workforce and engage fully with employers? What
might examples of non-financial support look like?

Yes, further non-financial support will be needed by colleges. However, Further Education has long
been an area of education that is chronically underfunded and now needs to be prioritised. We need
to ensure that this non-financial support is in addition to the financial support that will be required
for them to offer high quality and meaningful HTQs. This is especially important in STEM due to the
high cost of STEM learning and the skills shortage in the area.

There is a shortage of STEM teachers across the English education system with many initiatives not
yet managing to significantly increase the number of STEM teachers in schools or further education.
Therefore, any support given in this area would need to be innovative and on a large scale. To get
teachers with relevant industry experience it may be necessary to incentivise industry to ‘lend’
colleges a member of staff a certain number of days per year that the college could upskill to teach
students effectively.

Work based and work-related learning is especially important in STEM subjects, however as it is
made clear earlier in the document that HTQs will be mostly classroom based it is important that the
requirement to find any work placements it not placed solely with the college. An online based third-
party placement broker might be helpful e.g. [https://placer.co.uk/](https://placer.co.uk/)

A further form of support could be the setting up of peer group sessions with all trainers in a given
subject from across the country (these could be web-based information sharing), this would help
spread awareness of best practice and lessons learnt between institutions. A potential topic for this
could be how to make meaningful partnerships with industry, so advice on this could be shared between institutions.

Q12 (pg 30) We welcome ideas from respondents on:

- How providers could best allocate their existing resources to build and support capacity and delivery of approved HTQs;
- Where additional help may be needed; and
- What providers think should be prioritised in terms of any future funding allocation.

Although we do not have any specific answers to this question, we felt it is important to highlight the need for an understanding that needs will vary between institutions, especially by location. The support offered will need to be tailored for each institution based on location and their specialities. In some areas, staff and students may need to be more incentivised.

Q13 (pg 32) To what extent do you agree that there is a need and opportunity for more young people and adults to be undertaking HTQ in the future? Please include examples from your own experience.

We agree that there is a large need for the above. Within engineering education there is a big gap between Level 3 (Technician) and degree qualifications, which these HTQs could fill effectively. In our experience engineering employers continue to value this space in the education system which have been filled by HNDs and HNCs delivered by industry focused Further Education Colleges. Foundation Degrees delivered by Universities that do not contain genuine work-based learning have not provided an alternative to these. The Engineering profession is currently exploring how to recognise developing engineers with this level of education in its structures.

With the cost of education increasing we will likely see a rise in the need for HTQ in adults after they have been working for a while and really understand where they want to develop the careers. With some employers already seeing an increasing number of older applicants for the apprenticeship qualifications. Innovations in technology and digitalisation are likely to change the nature of some jobs within engineering, which may require them to upskill. Similarly, the use of AI could eliminate some technical and administrative roles in other industries and thereby increase the number of people who need to be retrained (for example cheque processing in the banking industry).

Q14 (pg 35) To what extent do you agree with these measures to improve the profile of HTE?

Currently, performance measures in schools place a greater value on getting student into university than into further or vocational education. This encourages schools to push pupils away from HTE at a time when parity of esteem between the two are critical for the success of the new HTQs. This is something that the IET, along with other PEIs, will be able to help with by voicing the value of HTQs through our channels. For HTQs to be a success we also feel that there needs to be parity of funding for the students, so learners from any background can consider HTQs alongside their other options.

We agree that working with professional bodies could add benefit in this area. The Engineering Council is carrying out a review of the standards of engineering education and competence which is
due to be published in the Spring of 2020. For the first time, these standards include knowledge and competence outcomes at levels 4 and 5 which could allow a clear mapping and orientation of HTQs to established Engineering Standards (eg Incorporated Engineer, Chartered Engineer) and accreditation by professional bodies such as the IET.

**Q15 (pg 39) To what extent do you agree with these measures to improve IAG for young people, adults and employers?**

We generally agree but are conscious that this is a difficult area to get right. Skilled professionals giving talks can help a great deal as it can help to show young people how their career can develop, as well as providing role models. Work experience is another effective way to support students with the choices and better help them understand more complex (and often misrepresented) industries such as engineering.

It will also be important to ensure clear and consistent labelling to ensure the qualifications are easily identifiable and their value is understood by teachers, parent, students and industry.

**Q16 (pg 42) Do you have any further evidence on what works on this space and what more the government can do to improve access and help support students to complete an HTQ?**

The improvement of access to the courses will be helped if the courses can be flexible in providing additional support for students in Maths, English and Digital skills. Universities used to use the first year getting everyone up to the same standard and level of understanding.

The use of “mentors”, perhaps from the students in the year above, would both help the new students realise they are not on their own and consolidate learning for the older students.

**Q17 (pg 42) – No comment**